

TSD File Inventory Index

Date: March 4, 2003

Initial: C. M. Heneax

Facility Name: <u>Carrollton Steel Company (One folder site)</u>			
Facility Identification Number: <u>DAD 077 752640</u>			
A.1 General Correspondence	Y	B.2 Permit Docket (B.1.2)	
A.2 Part A / Interim Status	Y	.1 Correspondence	
.1 Correspondence	Y	.2 All Other Permitting Documents (Not Part of the ARA)	
.2 Notification and Acknowledgment	Y	C.1 Compliance - (Inspection Reports)	
.3 Part A Application and Amendments	Y	C.2 Compliance/Enforcement	
.4 Financial Insurance (Sudden, Non Sudden)		.1 Land Disposal Restriction Notifications	
.5 Change Under Interim Status Requests		.2 Import/Export Notifications	
.6 Annual and Biennial Reports		C.3 FOIA Exemptions - Non-Releasable Documents	
A.3 Groundwater Monitoring		D.1 Corrective Action/Facility Assessment	
.1 Correspondence		.1 RFA Correspondence	
.2 Reports		.2 Background Reports, Supporting Docs and Studies	
A.4 Closure/Post Closure	Y	.3 State Prelim. Investigation Memos	
.1 Correspondence	Y	.4 RFA Reports	X
.2 Closure/Post Closure Plans, Certificates, etc	Y	D. 2 Corrective Action/Facility Investigation	
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.1 Correspondence		.2 RFI Workplan	
.2 Reports		.3 RFI Program Reports and Oversight	
B.1 Administrative Record		.4 RFI Draft /Final Report	

Total - 1

.5 RFI QAPP		.7 Lab data, Soil Sampling/Groundwater	
.6 RFI QAPP Correspondence		.8 Progress Reports	
.7 Lab Data, Soil-Sampling/Groundwater		D.5 Corrective Action/Enforcement	
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.4 CMS Draft/Final Report		F Imagery/Special Studies (Videos, photos, disks, maps, blueprints, drawings, and other special materials.)	
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.3 CMI Program Reports and Oversight		.6 Corrective Action Remediation Study	
.4 CMI Draft/Final Reports		.7 Corrective Action/Remediation Implementation	
.5 CMI QAPP		.8 Endangered Species Act	
.6 CMI Correspondence		.9 Environmental Justice	

Note: Transmittal Letter to Be Included with Reports.

Comments: *Documents do not justify individual filing schedule*



State of Ohio Environmental Protection Agency

P.O. Box 1049, 1800 WaterMark Dr.
Columbus, Ohio 43266-0149

Richard F. Celeste
Governor

NO 1/5 L

March 28, 1989

Re: The Warren Scrap Company
U.S. EPA ID No.: OHD077752640
Ohio Permit No.: 02-78-00BN
Closure Plan

The Warren Scrap Company
Attn: Mr. William Murray
641 Griswold Street NE
Warren, Ohio 44481

Dear Mr. Murray:

A public notice acknowledging the Ohio EPA's receipt of a closure plan for The Warren Scrap Company located at 641 Griswold Street NE, Warren, Ohio will appear the week of April 3, 1989, in the Warren Tribune Chronicle, Warren, Ohio. The Director of the Ohio EPA will act upon the closure plan request following the close of the public comment period, May 9, 1989.

Copies of the closure plan will be available for public review at the Warren-Trumbull County Public Library, 444 Mahoning Avenue NW, Warren, Ohio 44483 and the Ohio EPA, Northeast District Office, 2110 East Aurora Road, Twinsburg, Ohio 44087.

Please contact me at (614) 644-2934, if you have any questions concerning this matter.

Very truly yours,

Thomas E. Crepeau, Manager
Data Management Section
Division of Solid & Hazardous Waste Management

TEC/dhs

cc: Lisa Pierard, U.S. EPA, Region V
Randy Meyer, Ohio EPA, DSHWM, TA&ES
Paul Anderson, Ohio EPA, DSHWM, NEDO

2314R(35)

PUBLIC NOTICE

Trumbull County

RECEIPT OF HAZARDOUS WASTE CLOSURE PLAN

For: The Warren Scrap Company, 641 Griswold Street NE, Warren, Ohio, U.S. EPA ID No.: OHD077752640, Ohio Permit No.: 02-78-00BN. Pursuant to OAC Rule 3745-66-10 thru 17 and 40 CFR, Subpart G, 265.110 thru 117, the Ohio Environmental Protection Agency (Ohio EPA) is hereby giving notice of the receipt of a Hazardous Waste Facility Closure Plan for storage areas 1, 2 and 3 for the above referenced facility. Ohio EPA is also giving notice that this facility is subject to a determination concerning corrective action, a requirement under the Hazardous and Solid Waste Amendments of 1984, which concerns any possible uncorrected releases of hazardous waste or hazardous constituents to the environment from any current or previous solid waste management units at the above facility. A corrective action determination is required from hazardous waste facilities intending to close.

Copies of the facility's Closure Plan will be available for public review at the Warren-Trumbull County Public Library, 444 Mahoning Avenue NW, Warren, Ohio 44483 and the Ohio EPA, Northeast District Office, 2110 East Aurora Road, Twinsburg, Ohio 44087. Comments concerning the Closure Plan or factual information concerning any releases of hazardous waste or hazardous waste constituents by the above facility requiring corrective action should be submitted within 30 days of this notice to: Ohio Environmental Protection Agency, Div. of Solid & Hazardous Waste Mgmt., Data Management Section, Attn: Thomas E. Crepeau, Box 1049, Columbus, Ohio 43266-0149.

**A.2 Part A/
Interim Status**

**EPA Notification of Hazardous Waste**United States Environmental Protection Agency
Washington, DC 20460

87.10901

Please refer to the Instructions for Filing Notification before completing this form. The information requested here is required by law (Section 3010 of the Resource Conservation and Recovery Act).

For Official Use Only

Comments

C
C
N

Installation's EPA ID Number

Approved

Date Received
(yr. mo. day)C
F

OHDD077752640

T/A
C
1

A

870817

I. Name of Installation

WARREN SCRAP CO

II. Installation Mailing Address

Street or P.O. Box

C
3

641 GRISWOLD ST.

City or Town

State

ZIP Code

C
4

WARREN

OH 44483

III. Location of Installation

Street or Route Number

C
5

641 GRISWOLD ST.

City or Town

State

ZIP Code

C
6

WARREN

OH 44483

IV. Installation Contact

Name and Title (last, first, and job title)

Phone Number (area code and number)

C
2

MURRAY WILLIAM MGR

216 373 1391

V. Ownership

A. Name of Installation's Legal Owner

B. Type of Ownership (enter code)

C
R

FRED KNOX

P

VI. Type of Regulated Waste Activity (Mark 'X' in the appropriate boxes. Refer to instructions.)**A. Hazardous Waste Activity****B. Used Oil Fuel Activities**

- ☒ 1a. Generator ☒ 1b. Less than 1,000 kg/mo.
☐ 2. Transporter
☐ 3. Treater/Storer/Disposer
☐ 4. Underground Injection
☐ 5. Market or Burn Hazardous Waste Fuel
(enter 'X' and mark appropriate boxes below)
☐ a. Generator Marketing to Burner
☐ b. Other Marketer
☐ c. Burner

- ☐ 6. Off-Specification Used Oil Fuel
(enter 'X' and mark appropriate boxes below)
☐ a. Generator Marketing to Burner
☐ b. Other Marketer
☐ c. Burner
☐ 7. Specification Used Oil Fuel Marketer (or On site Burner)
Who First Claims the Oil Meets the Specification

RECEIVED
AUG 17 1987
U.S. EPA REGION V**VII. Waste Fuel Burning: Type of Combustion Device (enter 'X' in all appropriate boxes to indicate type of combustion device(s) in which hazardous waste fuel or off-specification used oil fuel is burned. See instructions for definitions of combustion devices.)**☐ A. Utility Boiler☐ B. Industrial Boiler☐ C. Industrial Furnace**VIII. Mode of Transportation (transporters only — enter 'X' in the appropriate box(es))**

- ☐ A. Air ☐ B. Rail ☐ C. Highway ☐ D. Water ☐ E. Other (specify)

IX. First or Subsequent Notification

Mark 'X' in the appropriate box to indicate whether this is your installation's first notification of hazardous waste activity or a subsequent notification. If this is not your first notification, enter your installation's EPA ID Number in the space provided below.

- ☒ A. First Notification ☐ B. Subsequent Notification (complete item C)

C. Installation's EPA ID Number

ID — For Official Use Only																
C															T/A	C
W																1

X. Description of Hazardous Wastes (continued from front)

A. Hazardous Wastes from Nonspecific Sources. Enter the four-digit number from 40 CFR Part 261.31 for each listed hazardous waste from nonspecific sources your installation handles. Use additional sheets if necessary.

1	2	3	4	5	6
F 0 0 1					
7	8	9	10	11	12

B. Hazardous Wastes from Specific Sources. Enter the four-digit number from 40 CFR Part 261.32 for each listed hazardous waste from specific sources your installation handles. Use additional sheets if necessary.

13	14	15	16	17	18
19	20	21	22	23	24
25	26	27	28	29	30

C. Commercial Chemical Product Hazardous Wastes. Enter the four-digit number from 40 CFR Part 261.33 for each chemical substance your installation handles which may be a hazardous waste. Use additional sheets if necessary.

31	32	33	34	35	36
37	38	39	40	41	42
43	44	45	46	47	48

D. Listed Infectious Wastes. Enter the four-digit number from 40 CFR Part 261.34 for each hazardous waste from hospitals, veterinary hospitals, or medical and research laboratories your installation handles. Use additional sheets if necessary.

49	50	51	52	53	54

E. Characteristics of Nonlisted Hazardous Wastes. Mark 'X' in the boxes corresponding to the characteristics of nonlisted hazardous wastes your installation handles. (See 40 CFR Parts 261.21 — 261.24)

☐ 1. Ignitable
(D001)

☐ 2. Corrosive
(D002)

☐ 3. Reactive
(D003)

☐ 4. Toxic
(D000)

XI. Certification

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

Signature 	Name and Official Title (type or print) FRED KNOX PRESIDENT	Date Signed AUG. 13, 1987
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A.4 Closure/
Post-Closure



State of Ohio Environmental Protection Agency

P.O. Box 1049, 1800 WaterMark Dr.
Columbus, Ohio 43266-0149
(614) 644-3020
FAX (614) 644-2329

George V. Voinovich
Governor

Donald R. Schregardus
Director

File in
Part A
File

CERTIFIED MAIL

October 23, 1991

RE: CLOSURE PLAN EXTENSION
Warren Scrap
Managements Areas
OHD 077 752 640

William P. Racine, President
Environmental Support Network, Inc.
Warren Scrap
4821 Munson Street, N.W.
Canton, Ohio 44718

OHIO EPA
OCT 23 91
DIRECTOR'S JOURNAL

Dear Mr. Racine:

On June 10, 1991, Environmental Support Network, Inc., acting on behalf of Warren Scrap Company, submitted a request for an extension to the closure period specified in the approved closure plan dated February 8, 1990, for 60 days until November 11, 1991. The extension request was submitted pursuant to OAC Rule 3745-66-13(B) as closure will require longer than the 180 day period specified in OAC Rule 3745-66-13. Warren Scrap Company has requested this extension to allow adequate time for preparation of a risk-based amended closure plan.

My staff reviewed your request and recommends that the extension be granted per rule 3745-66-13(B) of the Ohio Administrative Code. I concur and am therefore granting your extension request. This extension is being granted for the above reference closure plan and expires on November 11, 1991.

Warren Scrap Company shall continue to take all steps to prevent a threat to human health and the environment from the unclosed but inactive waste management unit per OAC Rule 3745-66-13(B) (2).

Please be advised that approval of this closure extension request does not release Warren Scrap Company from any responsibilities as required under the Hazardous and Solid Waste Amendments of 1984 regarding corrective action for all releases of hazardous waste or constituents from any solid waste management unit, regardless of the time at which waste was placed in the unit.

I certify this to be a true and accurate copy of the official document as filed in the records of the Ohio Environmental Protection Agency.

By: Mary Carvin Date 10/23/91

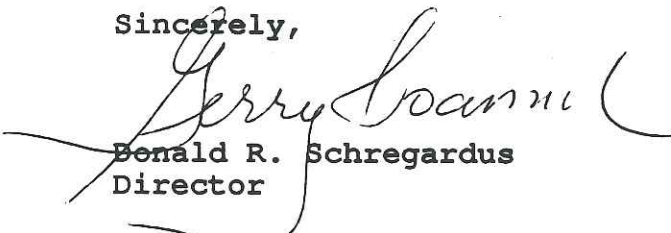
Mr. Racine
Page Two

When closure is completed, the Ohio Administrative Code Rule 3745-66-15 requires the owner or operator of a facility to submit to the Director of the Ohio EPA certification by the owner or operator and an independent registered professional engineer that the facility has been closed in accordance with the specifications in the approved closure plan. The certification shall follow the format specified in OAC 3745-50-42(D). These certifications should be submitted to: Ohio Environmental Protection Agency, Division of Hazardous Waste Management, Attn: Tom Crepeau, Data Management Section, P.O. Box 1049, Columbus, Ohio 43226-1049.

You are hereby notified that this action of the Director is final and may be appealed to the Environmental Board of Review pursuant to section 3745-04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. It must be filed with the Environmental Board of Review within thirty (30) days from the receipt of this letter. A copy of the appeal must be served to the Director of the Ohio Environmental Protection Agency with three (3) days of filing with the Board. An appeal may be filed at the following address:

Environmental Board of Review
236 East Town Street
Room 300
Columbus, Ohio 43215

Sincerely,


Donald R. Schregardus
Director

I certify this to be a true and accurate copy of the official document as filed in the records of the Ohio Environmental Protection Agency.

By: Mary Gavin Date 10/23/91

DRS/PV/pas

cc: Tom Crepeau, DHWM Central File, Ohio EPA
Lisa Pierard, USEPA - Region V
Joel Morbito, USEPA - Region V
Karen Nesbit, NEDO, Ohio EPA
Paul Vandermeer, DHWM, Ohio EPA

OHIO E.P.A.

OCT 23 91

ENTERED DIRECTOR'S JOURNAL



State of Ohio Environmental Protection Agency

P.O. Box 1049, 1800 WaterMark Dr.
Columbus, Ohio 43266-0149

Richard F. Celeste
Governor

CLOSURE PLAN APPROVAL

CERTIFIED MAIL

February 8, 1990

Re: Closure Plan
Warren Scrap Company
OHD 077 752 640

William Murray,
General Manager
Warren Scrap Company
641 Griswold Street N.E.
Warren, Ohio 44481

Dear Mr. Murray:

On March 23, 1989, Warren Scrap Company submitted to Ohio EPA a closure plan for three (3) hazardous waste storage areas located at 641 Griswold Street, N.E., Warren, Ohio. Revisions to the closure plan were received on December 19, 1989 in response to my September 11, 1989, closure plan disapproval letter. The closure plan was submitted pursuant to Rule 3745-66-12 of the Ohio Administrative Code (OAC) in order to demonstrate that Warren Scrap Company's proposal for closure complies with the requirements of OAC Rules 3745-66-11 and 3745-66-12.

The public was given the opportunity to submit written comments regarding the closure plan of Warren Scrap Company in accordance with OAC Rule 3745-66-12. No comments were received by Ohio EPA in this matter.

Based upon review of the company's submittal and subsequent revisions, I conclude that the closure plan for the hazardous waste facility at Warren Scrap Company meets the performance standard contained in OAC Rule 3745-66-11 and complies with the pertinent parts of OAC Rule 3745-66-12.

The closure plan submitted to Ohio EPA by Warren Scrap Company is hereby approved.

Notwithstanding compliance with the terms of the closure plan, the Director may, on the basis of any information that there is or has been a release of hazardous waste, hazardous constituents, or hazardous substances into the environment, issue order pursuant to Section 3734.20 et seq of the Revised Code or Chapters 3734 or 6111 of the Revised Code requiring corrective action or such other response as deemed necessary; or initiate appropriate action; or seek any appropriate legal or equitable remedies to abate pollution or

I certify this to be a true and accurate copy of the
official document as filed in the records of the Ohio
Environmental Protection Agency.

By: Mary Carr Date 2-8-90

Ohio Environmental Protection Agency
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FEB -8 1990


contamination or to protect public health or safety or the environment.

Nothing here shall waive the right of the Director to take action beyond the terms of the closure plan pursuant to the Comprehensive Environmental Response, Compensation and Liability Act of 1980, 42 U.S.C. §9601 et seq., as amended by the Superfund Amendments and Reauthorization Act of 1986, Pub. L. 99-499 ("CERCLA") or to take any other action pursuant to applicable Federal or State law, including but not limited to the right to issue a permit with terms and conditions requiring corrective action pursuant to Chapters 3734 or 6111 of the Revised Code; the right to seek injunctive relief, monetary penalties and punitive damages, to undertake any removal, remedial, and/or response action relating to the facility, and to seek recovery for any costs incurred by the Director in undertaking such actions.

You are notified that this action of the Director is final and may be appealed to the Environmental Board of Review pursuant to Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. It must be filed with the Environmental Board of Review within thirty (30) days after notice of the Director's action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency and the Environmental Enforcement Section of the Office of the Attorney General within three (3) days of filing with the Board. An appeal may be filed with the Environmental Board of Review at the following address: Environmental Board of Review, 236 East Town Street, Room 300, Columbus, Ohio 43266-0557.

When closure is completed, the Ohio Administrative Code Rule 3745-66-15 requires the owner or operator of a facility to submit to the Director of the Ohio EPA certification by the owner or operator and an independent registered professional engineer that the facility has been closed in accordance with the approved closure plan. The certification by the owner or operator shall include the statement found in OAC 3745-50-42(D). These certifications should be submitted to: Ohio Environmental Protection Agency, Division of Solid and Hazardous Waste Management, Attn: Thomas Crepeau, Program Planning and Management Section, P.O. Box 1049, Columbus, Ohio 43266-0149.

Sincerely,


Richard L. Shank, Ph.D.
Director

RLS/RM/pas

cc: Randy Meyer, Ohio EPA, DSHWM
Joel Morbito, USEPA - Region V
Tom Crepeau, Ohio EPA, DSHWM

Lisa Pierard, USEPA-Region V
Paul Anderson, NEDO, Ohio EPA
Dave Wertz, NEDO, Ohio EPA

2055U

I certify this to be a true and accurate copy of the official document as filed in the records of the Ohio Environmental Protection Agency.

By: Mary Carr Date 2-8-90

Ohio Environmental Protection Agency
ENTERED DIRECTOR'S JOURNAL

FEB -8 1990



State of Ohio Environmental Protection Agency

P.O. Box 1049, 1800 WaterMark Dr.
Columbus, Ohio 43266-0149

Richard F. Celeste
Governor

CLOSURE PLAN DISAPPROVAL

Issuance Date September 11, 1989

Effective Date October 11, 1989

CERTIFIED MAIL

September 11, 1989

Re: Closure Plan
The Warren Scrap Company
OHD 077 752 640

SQG

Mr. William Murray
The Warren Scrap Company
641 Griswold Street NE
Warren, OH 44481

Dear Mr. Murray:

No Ti

On March 23, 1989, The Warren Scrap Company submitted to Ohio EPA a closure plan for three (3) hazardous waste storage areas located at 641 Griswold Street NE, Warren, Ohio. The closure plan was submitted pursuant to Rule 3745-66-12 of the Ohio Administrative Code (OAC) in order to demonstrate that The Warren Scrap Company's proposal for closure complies with the requirements of OAC Rules 3745-66-11 and 3745-66-12.

The public was given the opportunity to submit written comments regarding the closure plan of The Warren Scrap Company in accordance with OAC Rule 3745-66-12. The public comment period extended from April 3, 1989, to May 9, 1989. No comments were received by Ohio EPA in this matter.

Based upon review of the company's submittal and subsequent revisions, I conclude that the closure plan for the hazardous waste facility at The Warren Scrap Company does not meet the performance standard contained in OAC Rule 3745-66-11 and does not comply with the pertinent parts of OAC Rule 3745-66-12.

The closure plan submitted to Ohio EPA by The Warren Scrap Company is hereby disapproved (see Attachment A).

I certify this to be a true and accurate copy of the official document as filed in the records of the Ohio Environmental Protection Agency.

By: Mary Carr Date 10-13-89


Ohio Environmental Protection Agency
ENTERED DIRECTOR'S JOURNAL

OCT 13 1989

You are notified that this action of the Director is issued as a proposed action pursuant to ORC Section 3745.07. This action will become final on the effective date indicated unless you or an objector files an appeal requesting an adjudication hearing within thirty (30) days of the date of issuance of this action. The adjudication hearing will be conducted in accordance with OAC Chapter 3745-47. The request for a hearing shall specify the issues of fact and law to be contested. Requests for hearings shall be sent to: Ohio Environmental Protection Agency, Hearing Clerk, 1800 WaterMark Drive, P.O. Box 1049, Columbus, OH 43266-0149.

A modified closure plan addressing the deficiencies enumerated in Attachment A must be submitted to the Director of the Ohio EPA for approval within thirty (30) days of the receipt of this letter in accordance with OAC 3745-66-12. The modified closure plan should be submitted to: Ohio Environmental Protection Agency, Division of Solid and Hazardous Waste Management, Attn: Thomas Crepeau, Manager, Data Management Section, P.O. Box 1049, Columbus, Ohio 43266-0149. A copy should also be sent to: Paul Anderson, Ohio EPA, Northeast District Office, 2110 East Aurora Road, Twinsburg, Ohio 44087.

Sincerely,



Richard L. Shank, Ph.D.
Director

RLS/RM/ps

cc: DSHWM Central File, Ohio EPA
Lisa Pierard, USEPA, Region V
Paul Anderson, NEDO, Ohio EPA
Dave Wertz, NEDO, Ohio EPA
Randy Meyer, DSHWM, Ohio EPA
Joel Morbito, USEPA, Region V

1942U

I certify this to be a true and accurate copy of the official document as filed in the records of the Ohio Environmental Protection Agency.

By: Mary Carini Date 10-13-89

Ohio Environmental Protection Agency
ENTERED DIRECTOR'S JOURNAL

OCT 15 1989

ATTACHMENT A

The Warren Scrap Company
OHDO77752640

1. The plan must include a brief description of the facility with regards to the type of industry, products, location, size and other general information.
2. A scale county or topographic map which indicates the location of the facility must be provided. In addition, a scale map or diagram of the entire facility must be provided which indicates the location of buildings, pertinent structures and all hazardous waste units to be closed.
3. The closure plan must contain a statement indicating that the facility is conducting a complete closure of all hazardous waste management units. In addition, a description of the status of the facility with regard to the management of hazardous wastes following closure must be provided.
4. The plan must be revised to include an inventory of all hazardous wastes ever stored, treated or disposed of in each hazardous waste management unit at the facility. The list must include an estimate of the maximum inventory (by weight or volume) of wastes stored in each unit by both generic chemical name(s) and EPA hazardous waste identification number(s).
5. The plan must be revised to include a detailed schedule for closure including dates for waste removal and backfilling operations (if necessary), and certification of closure. The schedule must also indicate all critical dates when the independent engineer or his representative will be present. Provision must also be made to contact the Ohio EPA inspector responsible for the site at least five (5) working days prior to all critical activities so that the agency may observe these activities.

The schedule for closure must begin at the date of approval by the Director of Ohio EPA, and shall not rely on calendar dates. If the closure activities must, by necessity, take longer than 180 days from the approval date, an extension must be requested according to the procedures outlined in OAC 3745-66-13 and 40 CFR 265.113.

6. The plan must be revised to include a description of methods which will be used to ensure the safety of personnel involved in closure activities.
7. Item No. 6 of the "Planning for Closure" section of the plan must be modified to indicate the parameters for which samples will be analyzed and the specific U.S. EPA Publication SW-846 ("Test Methods for Evaluating Solid Waste - Physical/Chemical Methods", Third Edition) analytical methods which will be used. The parameter list must be consistent with the hazardous waste inventory (see Modification No. 4 above).

Ohio Environmental Protection Agency
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OCT 13 1989

I certify this to be a true and accurate copy of the official document as filed in the records of the Ohio Environmental Protection Agency.

By: Mary Carr Date 10-13-89

8. Item No. 5 of the "Planning for Closure" section must reference the appropriate U.S. EPA publication SW-846 or ASTM methods which will be used to obtain soil samples.
9. Item No. 6 of the "Report" section of the plan discusses the structural integrity of the baler pit used to store hazardous wastes. In that discussion, it is indicated that the cracks noted in the walls of the pit are only superficial in nature and do not allow the movement of water into or out of the pit. However, no methodology is presented for the evaluation of the cracks except for visual observation of water levels in the pit. The photographs of the cracks in the pit walls included in the closure plan appear to indicate that leakage may occur through the walls since the walls are stained in a streaked pattern below the cracks. In addition, Ohio EPA noted that groundwater was flowing into the pit via a girder which passes through the concrete.

Warren Scrap shall revise the closure plan to present an acceptable method of determining the integrity of the pit walls with regard to the potential for contaminant migration, or shall revise Item No. 4 of the "Planning for Closure" section to conduct borings and obtain soil samples at depths sufficient to evaluate whether hazardous constituents have migrated from the pit. At this time, Ohio EPA's position is that it is necessary to conduct soil borings and obtain soil samples.

10. Item No. 7 of the "Planning for Closure" section must be revised to indicate the action levels which will be used to evaluate clean closure. For non-naturally occurring organic constituents, such as those stored at the Warren Scrap facility, clean closure target levels must be either:
 - a. the analytical detection limits for the constituent using methods outlined in U.S. EPA Publication SW-846, or
 - b. clean up target levels developed via a thorough risk assessment of the impacts of the site on human health and the environment.

The closure plan must state the specific target levels for each hazardous constituent which will be used to evaluate clean closure for each hazardous constituent of concern. If health based standards are to be proposed, they must be established via the inclusion of a risk assessment in the closure plan. The risk assessment closure option must document that the contaminants left in the soil will not adversely impact any environmental media (ground water, surface water, or atmosphere), and that direct contact through dermal exposure, inhalation, or ingestion will not result in a threat to human health. Because of the complex nature of risk assessment demonstrations, I suggest that you consult the March 19, 1987, Federal Register and USEPA's "Surface Impoundment Clean Closure Guidance Manual" and "Superfund Public Health Evaluation Model" for further guidance before deciding to pursue this alternative. A list

I certify this to be a true and accurate copy of the official document as filed in the records of the Ohio Environmental Protection Agency.

Ohio Environmental Protection Agency
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By: Mary Carr Date 10-13-89

OCT 13 1989

of risk assessment references is attached for your convenience (Attachment 8), however, please note: in all cases where guidance is used to aid in the risk analysis, the information in the March 19, 1987, Federal Register (Vol. 52, No. 53, pp. 8704-8709) shall be followed. For instance, the "Superfund Exposure Assessment Manual" allows for attenuation of contaminants in the environment; the guidance provided in the Federal Register (March 19, 1987) does not. The Federal Register (March 19, 1987) assumptions shall be used in all cases where there are conflicting decisions.

11. The plan must include a contingency for the provision of a soil remediation plan to Ohio EPA within fifteen (15) days of the receipt of laboratory results indicating that soils associated with any of the hazardous waste management units are contaminated above the clean closure target levels established for the site. The soil remediation plan must include a description of methods of excavation, procedures to be used to store excavated materials and to prevent the migration of hazardous constituents via runoff and dust emissions, procedures for decontamination of excavation equipment, and waste disposal.
12. The plan shall be revised to specify that soil sampling will continue until the full extent of contamination is determined.
13. The closure plan must be revised to include a description of procedures which will be used to decontaminate the baler pit. At a minimum, the baler pit walls and bottom must be scraped and steam cleaned to ensure that residual hazardous waste constituents are not present prior to filling. The rinsates from the decontamination procedures must be collected, tested, and disposed of as hazardous waste (F001).

The baler pit will be considered decontaminated when the final rinsates contain hazardous constituents in concentrations at or below the following clean standards:

- a. public drinking water maximum contaminant level (MCL) for hazardous waste constituents as promulgated in OAC 3745-81-11 and 40 CFR 141.11 for inorganics and OAC 3745-81-12 and 40 CFR 141.12 for organics; or
- b. if an MCL is not available, then the maximum contaminant level goal (MCLG) as promulgated in 40 CFR 141.50 shall be used; or
- c. if neither an MCL nor an MCLG is available, 1 mg/l shall be used.

If the MCL or the MCLG is less than the contaminant's analytical detection limit using methods found in U.S. EPA publication SW-846, the SW-846 analytical detection limit shall be used as the clean standard.

If the final rinsate exceeds the clean standards outlined above, a contingency for additional rinses and/or alternative decontamination or demolition activities must be provided.

I certify this to be a true and accurate copy of the official document as filed in the records of the Ohio Environmental Protection Agency.

By: Mary Carr Date 10-13-89

Ohio Environmental Protection Agency
ENTERED DIRECTOR'S JOURNAL

OCT 13 1989

14. A description of methods which will be used to decontaminate equipment used during closure activities (including sampling equipment) must be provided. All decontamination procedures must be conducted in an area which is lined and diked to prevent the migration of hazardous constituents and which will allow for the collection of rinsates for proper treatment and disposal. All contaminated rinsates collected must be containerized and disposed of as hazardous waste (F001).
15. The closure plan must be revised to indicate that the owner/operator and the independent professional engineer will provide certifications of closure to the Director of Ohio EPA and the U.S. EPA Regional Administrator within sixty (60) days of the completion of closure activities as required by OAC 3745-66-15 and 40 CFR 265.115. The certification must follow the signature requirements of OAC 3745-50-42 and 40 CFR 270.11 and must include the exact wording found in OAC 3745-50-42 (D) and 40 CFR 270.11 (d).

1942U

I certify this to be a true and accurate copy of the official document as filed in the records of the Ohio Environmental Protection Agency.

By: Mary Cavin Date 10-13-89

Ohio Environmental Protection Agency
ENTERED DIRECTOR'S JOURNAL

OCT 13 1989

RECEIVED

MAR 23 1989

OFFICE OF RCRA
Waste Management Division
U.S. EPA, REGION V

MORTON L. LEVY & CO.
23260 Shaker Blvd.
Shaker Hts., Ohio 44122
216-591-9323

CONSULTING CHEMICAL ENGINEER & CHEMIST

March 20, 1989

Ms. Lisa Pierard
Chief of Tech Programs Systems
Ohio Unit
U.S. Environmental Protection Agency
Region V
230 S. Dearborn St.
Chicago, IL 60604

Dear Ms. Pierard:

Please find enclosed a copy of a closure plan prepared for The Warren Scrap Co., 641 Griswold St., N.E., Warren, OH 44481.

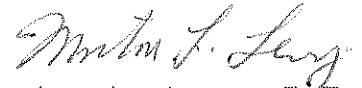
Two copies of the closure plan have been sent to Mr. Thomas Crepeau, Ohio EPA, Div. of Solid and Hazardous Waste Management Section.

One copy of the plan has been sent to Mr. Paul Anderson, E.S., OEPA, N.E. District Office, Twinsburg, OH.

Thank you for your cooperation.

Very truly yours,

MORTON L. LEVY & CO.



Morton L. Levy, P.E.
Reg. Chem. Eng.
Ohio Ser. No. E-013315

Wsc1slp.11

A

WARREN SCRAP COMPANY

641 GRISWOLD STREET, N.E.
WARREN, OHIO 44481
TELEPHONE 216/373-1391

March 10, 1989

Thomas Crepeau
Ohio E.P.A.
Division of Solid & Hazardous
Waste Management Section
P.O. Box 1049
Columbus, Ohio 43266-0149

Dear Mr. Crepeau:

Please find attached a closure plan for areas 1, 2, and 3, located on our property: 641 Griswold Street NE, Warren, Ohio.

The attached closure plan has been prepared by Mr. Morton Levy, P.E., a registered Chemical Engineer in the state of Ohio, Serial number E-013315.

Respectfully submitted,

WARREN SCRAP COMPANY

William Murray Ljk
William Murray
General Manager

cc: Paul Anderson, E.S. NEODO EPA, Twinsburg, Ohio
Ms. Lisa Pierard, Technical Program Office USEPA, Region V

/

CLOSURE PLAN

CLOSURE PLAN FOR AREAS I (1), II (2), and III (3) AT THE WARREN SCRAP
COMPANY, 641 GRISWOLD STREET N.E., WARREN, OHIO 44481.

Submitted by

Morton L. Levy, P.E.

Registered Chemical Engineer

Ohio Ser. No. E-013315

Date: March 9, 1989

MORTON L. LEVY & CO.
23260 Shaker Blvd.
Shaker Hts., OH 44122

(216)-991-9323

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MORTON L. LEVY & CO.
23260 Shaker Blvd.
Shaker Hts., Ohio 44122
216-991-9323

CONSULTING CHEMICAL ENGINEER & CHEMIST

March 09, 1989

To: The Warren Scrap Co.
641 Griswold ST., N.E.
Warren, OH 44481

Attn: Mr. Wm. Murray
General Manager

REPORT

EPA CLOSURE PLAN, AREAS I (1), II (2) And III (3).

This plan is submitted to you for forwarding to OHIO EPA in order to effect closure of Areas 1, 2 and 3 located on your property at 641 Griswold St., N.E., Warren, Ohio 44481, 216-373-1391.

The plan, if and when approved, will ensure a safe environment, and at the same time start the process of returning the affected areas to productive use.

1.

Areas 1, 2 and 3 at The Warren Scrap Co. are locations at which EPA F001 listed solvents were stored in non compliance with EPA regulations. Areas 1 and 2 are non paved. The F001 solvents stored on them were in steel drums supported on wood pallets. Area 1 is 256 sq. ft. and area 2 is 231 sq. ft.

Area 3, known as the "old baler pit", once served as the foundation for a baling machine (long since removed). The pit is of impressive construction, made of concrete walls and floor. The walls are a minimum of one (1) foot thick and the floor is considered to be the same. For the most part, the pit is 12'-4" deep. The west end of the pit is 31" deep. The open area is 107 sq. ft.

The F001 solvents found in this area were a mix of drums and oily water. The source of the latter was surface ground runoff water from rains.

Detailed sketches, drawings and photographs are submitted with this plan.

2.

Basic correspondence prior to and leading up to the closure plan being presented are three (3) letters from OH EPA to Warren Scrap Co. and one (1) letter vice versa (copies enclosed).
a.) Certified letter dtd. 8/4/87 from Kevin Clouse (S&E) with preliminary results of analysis from samples taken 7/28/87.

b.) Ltr. dtd. 2/18/88 from Randy Walton (S&E) with instructions for implementing a closure plan. RW expressed concern for ground water contamination due to possible migration of F- solvents. Also wanted copies of manifests of all haz waste removed from pit (solids and liquids).

c.) Ltr. dtd. 5/19/88 from Warren Scrap (Bill Murray) to OH EPA, (Randy Walton) and summing up shipments of haz waste together w/ copies of manifests. Ltr. also stated that a licensed engineer had been contacted to evaluate and propose a closure program.

d.) Ltr. from Paul Anderson, Environmental Scientist, dtd. 11/21/88 requesting the closure plan to go forward.

3.

Since the pit was drained and cleaned of oil, water and drums prior to 5/19/88 (all manifested and shipped to permitted Haz Waste operations, Solid-Tek Systems, Inc., Morrow, GA and Chemtron, Inc., Avon Lake, OH, please see copy of letter dtd. 5/19/88 from Warren Scrap to Mr. Randy Walton, OH EPA), it had refilled with ground runoff water, making it impossible to check for structural integrity until the contents (rainwater) was pumped out to permit inspection.

The pit, after it had been emptied and cleaned, was covered with a welded steel plate to prevent accidents and to keep out direct rainfall. However, as noted above, surface ground water from rain had easy access to the pit as the plate was not level and a flush fit was impossible.

An encouraging observation concerning possible groundwater migration from the pit was that the level of water in it did not recede appreciably at any time. Rapid evaporation was prevented by

the large steel plate cover, though surface groundwater could and did enter from time to time.

In this regard, one should note that the undersigned first viewed the pit on 5/26/88, then on 8/24/88, 8/30/88 (date pit water was sampled), and again on 11/14/88 when the pit was drained. During this interval, Ohio had a record breaking drought with little rain. From the photo taken on 5/26/89 and comparing with photos made on 8/30/88 and 11/14/88, the level of the surface water is remarkably constant.

With little rain (input) and limited evaporation (output), the constant surface level indicates that there is little or no movement of water from the pit. The fact that the pit is 12'-4" deep and the water level always seemed to be about 1' from the top, one has to conclude that the leakage rate is very small, if any.

4.

Before the water could be pumped from the pit, a chemical analysis was needed. On 8/30/88, the water in the pit was sampled by Ohio EPA (Mr. Paul Anderson) and the undersigned. Six (6) water samples were taken. Three (3) from just under the surface at different locations and Three (3) at <8" from the bottom at different locations. The undersigned transported his samples to Wadsworth/Alert Labs, Cleveland, OH with instructions to analyze for

Trichloroethylene, 1,1,1-Trichloroethane and Perchloroethylene. Mr. Anderson returned his samples to EPA. Please see attached for copies of MLL field notes and Mr. Anderson's field notes, includes sketches. Also, please find attached copies of W/A Labs analysis together with sample documentation.

These samples show that the surface water of the pit averaged 1.5 p.p.m. for Trichloroethylene, 0.16 p.p.m. for 1,1,1-T.C.E., and 0.082 p.p.m. for Perchloroethylene.

For the samples taken at <8" from the bottom, the average was 9 p.p.m. for Trichloroethylene and not detected for 1,1,1-TCE and Perchloroethylene.

5.

On 9/30/88, the undersigned contacted Mr. Robert Barker, Pre-treatment Coordinator for the Warren, Ohio Water Pollution Control Dept. and obtained the list of parameter limits for the acceptance of waste water.

Dr. Howard Mettee of M&M Consultants, Inc., P.O. Box 36, Youngstown, Ohio 44501, (216-742-3669), was requested by the undersigned to sample the water in the pit and analyze same for the parameters required for disposal to the City of Warren's sewer system. Dr. Mettee took samples of the pit water on 10/3/88.

Dr. Mettee's report dated 10/25/88 was received on 10/27/88 (copy attached). Please note that the parameter, TOX (Total Organic Chlorine Compounds) was 3.74 p.p.m in Dr. Mettee's report.

The City of Warren agreed to accept the pit contents. The pump out operation started and was completed on the same day, 11/14/89. Mr. Paul Anderson of Ohio EPA was present during this operation. Three (3) tanker truckloads were pumped from the pit and transferred to the City of Warren Sewer System via the Page Ave. Sewer near the Warren Scrap Co. The three (3) tanker loads were tare and gross weighed with net wts. all appearing on printouts (copies attached). The total water removed from the pit was 59,200 lbs. net, which calculates to 7,107 gallons using the factor of 8.33 lbs. of water /gallon.

Using the pit measurements and noting that the water level was 11 inches from the top before pumping, the calculated water to the sewer was 7,337 gallons.

After pumpout was completed, three (3) 50 lb. bags of "Lowes Safety Absorbent" were used to soak up the film of water on the concrete (cement) floor and shovelled into two (2) steel 55 gal. drums. The drums were sealed, marked with Haz Waste labels and are stored at the Warren Scrap Co.

6.

The concrete (cement) floor was in perfect condition, smooth and crack free. The walls (N. and S.) had a crack on each, but in no case were they deeper than 1/4", and for most of their course were less than 1/32" to 1/16". The center of the crack on the S. wall was 22" from the top of the wall. Please see drawing labelled "Elevation of Old Baler Pit Between A-A' and B-B' Shown on

5

Plan View". This drawing, in conjunction with the one labelled, "Plan View of Old Baler Pit (Area 3)" and photograph no's. 18A, 20, 22, 22A delineate the two cracks, one on each wall.

As the pit was being emptied, we noted a slow drip of water emanating from the bottom of the S. end of the Westerly girder. By the time the pit was 1/2 emptied, the drip had slowed to about one (1) drop every 1 - 2 minutes (see photo #22A). The undersigned tried to take a crude sample by wiring a bottle to the underside of the girder, but only managed to get approximately 1 1/2" of water in a pint jar. The undersigned acknowledges that the sample was not a valid one (due to extreme headspace), but it was the best that could be done under the circumstances. The purpose that day was to empty the pit so as to examine the structure of same.

The aforementioned sample was analyzed together with two (2) sediment samples, one taken from the N. side of the cement floor 2.5" from top of step and one taken from the S. side of the cement floor 2.5" from top of step. This area is at the West end of the pit which forms a key slot and is not very deep. Photo no. 21 shows the area from which the N. side sediment sample was taken. The S. side sediment sample is opposite the former, but in shadow. The camera was aimed West for this photo.

Wadsworth/Alert Labs analyzed the three (3) samples noted above, one drip sample and two sediment samples. Their report dated 12/5/88 is attached. The sediments averaged 6.5 milligrams of Trichloroethylene per Kilogram (6.5 ppm by wt.). The "drip" water sample analysis was 0.024 ppm for Trichloroethylene (flawed sample as noted above).

PLANNING FOR CLOSURE

With the preceeding as background, the following presents the approach to closure for Areas I (1), II (2) and III (3).

1.

The first step for all three areas is to define the extent of contamination in the soil. This will require soil borings to be taken and then analyzed for specific contaminants.

Areas 1 and 2 are similar and have less complicating circumstances than Area 3, which makes it easier to apply a straightforward grid soil boring and sampling plan for them.

For the three (3) areas, the drawings and sketches are presented in the following order:

a.) A general drawing to locate the area for which closure is being considered, essentially, a plan view with vectors from fixed and prominent locations on the Warren Scrap property.

b.) An enlarged view of the specific area, to accomodate the grid plan.

2.

Areas 1 and 2 are rectangular and applying the formula given in the 2/8/88 revision of The Ohio EPA Closure Guide (later corrected), is straightforward for determining the grid interval.

Applying the Grid Interval Formula (G.I.) to Area 3 is not practical as soil boring will have to be done at the pit area perimeter.

Therefore, Area 3 has an additional drawing, a cross section thru the plan view which gives information relative to depth and details noted during the structure inspection.

The planned depth of boring for Area's 1 and 2 is two feet (2') for each of the designated drilling positions. Samples from each designated drilling position will be marked with Area no., Grid Location no. and depth, i.e., 0'-1' or 1'-2'. Each of the samples will be analyzed separately for trichloroethylene, 1,1,1-trichloroethane and perchloroethylene.

3.

The designated drilling areas on the plan are those whose grid numbers are underlined. The other grid numbers on the drawings are there for reference and to keep the rationale intact for reviewers.

Please note that on Areas 1 and 2, there are underlined numbers outside of the grid area located 1.5' on a normal from the area perimeter, usually in line with a grid center. These locations have been chosen for drilling to insure that the assigned perimeters are limits of contamination.

The underlined numbers chosen for drilling outside the perimeter also have a letter after them (N, S, W and E.) which indicates the direction they are in from a similar number inside the perimeter.

4.

Based on the preceeding, the numbers of the grids to be bored in Areas 1 and 2 are eight (8) ea. They are 2N, 1, 4W, 7, 8S, 9, 6E and 3.

There are 19 drilling sites in area 3, No.'s 1 thru 19. It is planned to drill to the 3' level below the surface. It is planned to drill to the 3' level on each of the numbered positions and to take three (3) samples from each, 0'-1', 1'-2', 2'-3'. Each of the samples from Area 3 is to be analyzed for Trichloroethylene, 1,1,1-Trichloroethylene and Perchloroethylene.

The contaminants to be analyzed in the soil samples are normally not a constituent in them. Therefore, at this time, no provision is being made for taking borings from background locations.

Please note that the grid plans presented for Areas 1, 2, and 3 contain drilling sites beyond the known affected perimeters to ensure adequate coverage.

5.

We expect to use a split spoon sample borer that will maintain the integrity of the vertical dimension, so that upon withdrawing the total sample from the site hole, it can be split into the appropriate sample container assigned to the level from which it originally came.

6.

Analysis of the soil samples will be conducted with standard methods as published in SW 846. The analytical instrumentation will be GLC with an EC detector.

Analysis will be performed by any of the following: a) Wadsworth/Alert Labs., Cleveland, OH, b) Aquatech Environmental Consultants, Melmore, OH, c) Holk Environmental Services, Valley View, OH. All of the preceeding organizations have approved QC/QA Manuals, Change of Custody and Sample Documentation procedures.

7.

The Warren Scrap Co. is applying for a CLEAN CLOSURE. Therefore, if soil contamination is found for the F001 listed solvents beyond the perimeters in the present plan, additional soil borings and analyses will have to be taken to determine extent of same.

It is the understanding of the undersigned that OH EPA prescribes cleanup of F001 listed solvents to the "non detectable limits of analytical chemistry" OR the use of RISK ANALYSIS techniques to define a lower limit. Since the analytical methods are continually pushing back the detectable limits of chemical analysis, the possibility exists that we should be prepared to discuss with OH EPA previous risk assessments that may have shed light on "reachable numbers".

8.

All contaminated soils will be removed to a permitted Haz. Waste facility. It is planned to backfill any excavations with clean soil.

In the case of the "old baling pit", it will be filled with clean

8

sand to within one (1) foot of the top, then covered with clean topsoil. The perimeter of the baling pit, if excavation is required due to contamination, will be backfilled with clean soil to the surface.

ISSUE OF GROUNDWATER DECONTAMINATION

OEPA's letter dated 2/18/89 (signed by Mr. R. Walton, S & E Section) stated that the issue of off site migration of F-list solvents through groundwater, from the cleanup and decontamination of the baler pit, be addressed in our closure plan.

Previously, the undersigned has stated that Mr. Wm. Murray, Gen. Mgr. of The Warren Scrap Co., had by his letter of 5/19/89 to Mr. Walton, detailed the hazardous waste shipping and manifesting of liquids and solids resulting from the cleanup activity in the baler pit.

The undersigned has in previous paragraphs submitted soil boring plans which will show the extent of contamination of the F list solvents. If "Warren Scrap Co." has the problem, the analysis of the soil borings will indicate the remedial action to take.

The undersigned has indicated previously that the integrity of the baler pit does not seem to have been breached. By inspection, the structure is still sound and appears not to have allowed any leakage from the pit to the surrounding environment (soil).

Sect. 3 of this closure plan discusses the observation that for almost five months during Ohio's severe drought, the level of the water in the pit did not decrease. Since the pit was kept covered with a steel plate, the evaporation was at a minimum. Very little rain and/or surface water could have entered because of the drought. If the integrity of the pit had been breached in any way, the pressure head of water in it was sufficient (136") to cause leakage through the structure. Yet, the level of the water remained constant.

The undersigned does not believe that the pit (cleaned and decontaminated) is a further source or threat to soil or groundwater.

We do expect to find some soil contamination, but we hope that we will be able to remediate by excavation and removal of contaminated soil to a permitted Haz. waste facility. In the event, we have a "worst possible scenario", a monitoring well will have to be installed on or adjacent to the property.

Please look at the photo section in this report and compare water levels in the pit from 5/26/88 to 8/30/88. We have no photo of the water level on 11/14/88 (the day of the pumpout) but it was measured and found to be 11 inches from the top of the wall.

Respectfully submitted,

MORTON L. LEVY & CO.

Morton L. Levy
Morton L. Levy, P.E.

I Certify That The Above Report Is True And Correct.

Morton L. Levy

WSCLS.8

Morton L. Levy 9

Morton L. Levy, P.E.
Reg. Chemical Engineer
Ohio Ser. No. E-013315



State of Ohio Environmental Protection Agency

P.O. Box 1049, 1800 WaterMark Dr.
Columbus, Ohio 43266-0149



August 4, 1987

Richard F. Celeste
Governor

CERTIFIED MAIL

Mr. Ed Knox
Warren Scrap
641 Griswald St.
Warren, Ohio 44481

Dear Mr. Knox:

In conjunction with the Trumbull County Sheriff's Office, agents from the Ohio Attorney General's Bureau of Criminal Investigation along with Randy Walton and myself of the Ohio EPA conducted a search of your premises on July 28, 1987. ~~At that time we collected samples from five 55-gallon metal drums.~~ A soil sample in your yard was also taken along with two oil/water samples from a covered concrete pit near your western boundary which you indicated was the area where drums containing oil and degreasing solvents had recently been dumped.

Preliminary laboratory analysis of the 8 samples taken indicate materials in the pit and in the drums contain hazardous waste. (Trichloroethylene, tetrachloroethylene and 1,1,1, trichloroethane) At a minimum, the presence of these materials in these locations on your premises constitutes a violation of Ohio Revised Code (ORC) Section 3734-02-F. Complete analytical results from other areas of your facility have not yet been received at this office.

This material must be transported and disposed in accordance with all applicable state and federal regulations at a permitted treatment storage or disposal facility. You must obtain a permanent generator ID number in addition to the emergency ID number you already obtained. The permanent ID will be needed when disposing of the drummed waste along with shipments from the cleanup of any contaminated areas.

As was discussed, I have enclosed a list of hazardous waste companies who can address your waste areas.

This letter does not constitute a waiver for past or ongoing violations. It also shall not be construed as final action of the Agency.

If you have any questions, please contact Randy Walton or me at 614/481-7227.

Sincerely,

Kevin Clouse
Surveillance & Enforcement
Division of Solid and Hazardous Waste Management

Attachment

cc: Mike Savage, S&ES
Deborah Berg, NEDO
Brad Tompkins, ACO



State of Ohio Environmental Protection Agency

P.O. Box 1049, 1800 WaterMark Dr.
Columbus, Ohio 43266-0149



Richard F. Celeste
Governor

February 18, 1987

BB

Warren Scrap Co.
641 Griswald Street
Warren OH 44481

Dear Mr. Knox:

Regarding the cleanup and decontamination of the baler pit near the west edge of your Griswald Avenue Facility, OEPA is concerned about the off-site migration of the F list solvents through ground water. We expect the issue of groundwater contamination and subsequent migration to be addressed in a closure plan for the pit per OAC 3745-66-10 through 20 and 40 CFR part 265 subpart G. We have enclosed a draft of the general guidelines for closure plan review used by our technical review personnel. This could be used as a checklist when preparing your own plan. Your plan should be submitted to Mr. Tom Crepeau at the above address and George Hamper at the USEPA.

To further document your clean-up activities please send copies of the manifests of all hazardous waste liquids and solids from the pit to the attention of Randy Walton at the above address.

Sincerely,

Randy Walton
Surveillance & Enforcement Section
Division of Solid and Hazardous Waste Management

RW/drr

1872S(10)

cc: Mike Savage, CO
Tony Sasson, CO
Debby Berg/Kris Coder, NEDO
RF

WARREN SCRAP COMPANY

641 GRISWOLD STREET, N.E.
WARREN, OHIO 44481
TELEPHONE 216/373-1391

May 19, 1988

Mr. Randy Walton
Ohio EPA
P.O. Box 1049
1800 Water Mark Drive
Columbus, Ohio 43266-0149

Our ref.: OHD077752640
Your ref.: Letter, Feb. 18, 1988

Dear Randy:

Enclosed please find a copy of the hazardous waste manifest covering the final 20 drums shipped from our yard to Solid-Tek Systems, Inc., Morrow, Ga. Sixty six drums were previously shipped to Morrow, Ga., on May 12, 1988; a copy of the manifest was mailed to you at that time.

In addition, we shipped the eight drums of liquid waste trichloroethylene to Chemtron, Avon, Ohio, on May 18, 1988, and forwarded your copy of that manifest.

This completes the shipments of all waste materials from our facility. We have contacted a licensed engineer to evaluate and propose a closure program as outlined in your above referenced letter.

Very truly yours,

WARREN SCRAP COMPANY

William Murray
General Manager



State of Ohio Environmental Protection Agency
Northeast District Office
2110 E. Aurora Road
Twinsburg, Ohio 44087
(216) 425-9171

11-22-88
M.A.T.

ATTACHED COPY RECEIVED FROM
ANDERSON-EPA THIS AM.
SEEMS BALL IS NOW IN YOUR COURT.
REGARDS

13

Richard F. Celeste
Governor

BILL-WARREN SCRAP

November 21, 1988

CERTIFIED MAIL

Bill Murray
Warren Scrap Company
641 Griswold Street, N.E.
Warren, Ohio 44481

Dear Mr. Murray:

Thank you for your courtesy during my visit on November 14, 1988.

As you know, during my visit the baler pit formerly used to store hazardous wastes was pumped, and the pit was inspected by your consultant, Mort Levy. It should now be possible for you to formulate a closure plan for the pit and the drum storage areas used to store hazardous wastes. The closure plan must be constructed to meet the closure performance standard (OAC 3745-66-11) and the requirements of OAC 3745-66-10 through 20 (40 CFR Part 265, Subpart G). I have supplied your consultant with a copy of the Ohio EPA Closure Plan Review Guidance Document, which should be consulted during the construction of the plan.

Please submit three copies of the closure plan to the address below within thirty days. The plan should be sent:

Mr. Thomas Crepeau
Program Planning and Management Section
Division of Solid and Hazardous Waste Management
Ohio EPA
P. O. Box 1049
Columbus, Ohio 43266

As I mentioned to you during my visit, you may proceed with any obvious requirements of closure, such as waste removal, immediately. However, technical aspects of closure such as sampling and final filling of the pit must await approval of the closure plan by Ohio EPA. All wastes removed from the pit or other hazardous waste management units must be managed as hazardous wastes unless permission is received from Ohio EPA to allow a different disposition.

Mr. Bill Murray
Warren Scrap Company
November 21, 1988
Page -2-

If you should have any questions, please feel free to contact me.

Sincerely,

A handwritten signature in cursive script that reads "Paul Anderson". The signature is fluid and written in dark ink.

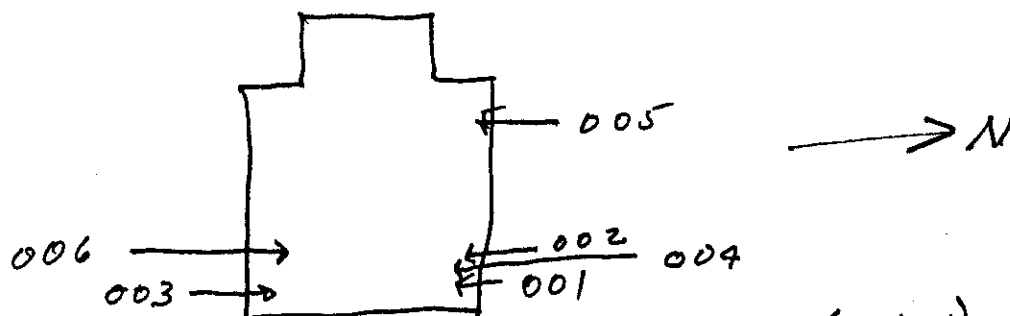
Paul Anderson
Environmental Scientist
Division of Solid and Hazardous Waste
Management

PA/sp

cc: Debby Berg, DSHWM, NEDO
Randy Walton, SIU, Central Office
Paul Vandermeer, DSHWM, Central Office

8-30-88Sampled H₂O in Pit mfg Notes

all #'s preceded by WS

SKETCH H₂O SAMPLE LOCATIONS (ROUGH)

WS 001, 002, 003 samples f/just under surface

WS 004, 005, 006 samples taken 8" f/bottom

Samples f/just under surface were separate samples, i.e. no splits, separate samples f/each location

Samples f/8" off bottom were split from Wildco Model 1420 PVC Kemmerer Bottle.

KB was cleaned previously w/ alcorno, followed by rinses of Dist. H₂O, HCl, & Dist. H₂O. Samples delivered to W/A Labs. for det. of TCE, 1,1,2-TCE & PERC.9/28/88

Results of analyses of WS 001 thru 006 rec'd f/W/A Labs on 9/28/88.

W it

Let's

and Fath

Sample Henderson/Hungry

Sample I.D. #1 Waste Pit - Upper Layer
3 Vac vials taken from the surface
of waste pit. Samples split with
Mort Levy, Consultant for analysis at
Wadsworth Labz. Vials labeled WS001, WS002, & WS003

Sample I.D. #2 Waste Pit - Lower Layer
3 Vac vials taken from Kemmerer
sampler from bottom layer of waste
pit. Kemmerer is a Wilco probe
1420 PVC sampler. Sample split w Mort Levy, Consultant
vials labeled WS004, WS005, & WS006
Sample I.D.

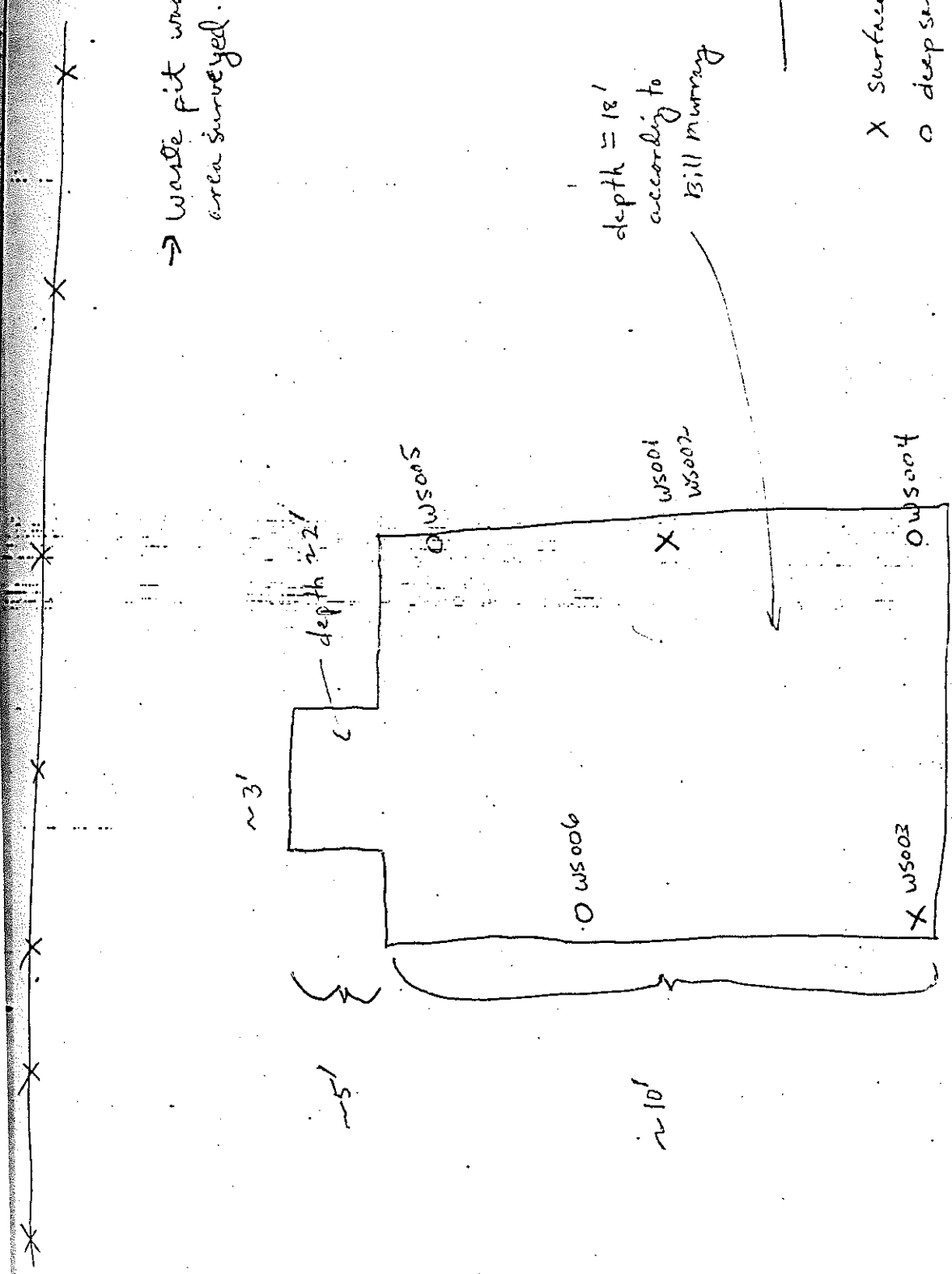
Sample I.D.

Sample I.D.

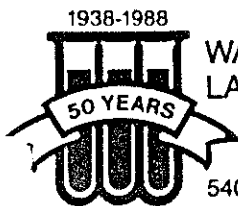
Sample I.D.

Comments: Surface samples were not split from single grab, but were surface samples taken from the same locations.
Deep samples were split from single Kemmerer grab samples.

Waste pit was only area surveyed.



Site Map: Sketch Site, Mark Sampling Locations, Indicate Directions (N-E-S-W)



WADSWORTH/ALERT
LABORATORIES, INC.
Sampling, testing, mobile labs

5405 E. Schaaf Rd./P.O. Box 31454/Cleveland, OH 44131/(216) 642-9151

19

ANALYTICAL REPORT

Project No. 5833

Presented to :

William Murray

Warren Scrap Co.

WADSWORTH/ALERT LABORATORIES, INC.

Dale Mori
Project Manager

J. William Botimer
Laboratory Manager - Cleveland

September 27, 1988



CORPORATE AND LABORATORY: North Canton, Ohio (216) 497-9396
LABORATORY: Cleveland, Ohio (216) 642-9151
LABORATORY: Bartow, Florida (813) 533-2150
SOUTHEAST REGIONAL OFFICE: Lexington, South Carolina (803) 957-6590
24-HOUR ALERT LINE: (216) 497-9338



WADSWORTH/ALERT
LABORATORIES, INC.

20

COMPANY: Warren Scrap Co.
LAB #: 5833-31912
MATRIX: WATER

DATE RECEIVED: 8/30/88
DATE EXTRACTED: 9/ 6/88
DATE ANALYZED: 9/ 6/88

SAMPLE ID: WS-001

SELECTED ORGANIC COMPOUNDS ANALYTICAL REPORT

PARAMETER	RESULT (ug/l)	DETECTION LIMIT
Trichloroethene	1,500	50
1,1,1-Trichloroethane	190	50
Tetrachloroethene	100	50

NOTE: ND (None Detected)
J (Detected, but below quantitation limit; quantitation suspect)



WADSWORTH/ALERT
LABORATORIES, INC.

21

COMPANY: Warren Scrap Co.
LAB #: 5833-31913
MATRIX: WATER

DATE RECEIVED: 8/30/88
DATE EXTRACTED: 9/ 6/88
DATE ANALYZED: 9/ 6/88

SAMPLE ID: WS-002

SELECTED ORGANIC COMPOUNDS ANALYTICAL REPORT

PARAMETER	RESULT (ug/l)	DETECTION LIMIT
Trichloroethene	1,500	50
1,1,1-Trichloroethane	110	50
Tetrachloroethene	62	50

NOTE: ND (None Detected)
J (Detected, but below quantitation limit; quantitation suspect)



WADSWORTH/ALERT
LABORATORIES, INC.

22

COMPANY: Warren Scrap Co.
LAB #: 5833-31914
MATRIX: WATER

DATE RECEIVED: 8/30/88
DATE EXTRACTED: 9/ 6/88
DATE ANALYZED: 9/ 6/88

SAMPLE ID: WS-003

SELECTED ORGANIC COMPOUNDS ANALYTICAL REPORT

PARAMETER	RESULT (ug/l)	DETECTION LIMIT
Trichloroethene	1,500	50
1,1,1-Trichloroethane	190	50
Tetrachloroethene	94	50

NOTE: ND (None Detected)
J (Detected, but below quantitation limit; quantitation suspect)



WADSWORTH/ALERT
LABORATORIES, INC.

23

COMPANY: Warren Scrap Co.
LAB #: 5833-31915
MATRIX: WATER

DATE RECEIVED: 8/30/88
DATE EXTRACTED: 9/ 6/88
DATE ANALYZED: 9/ 6/88

SAMPLE ID: WS-004

SELECTED ORGANIC COMPOUNDS ANALYTICAL REPORT

PARAMETER	RESULT (ug/l)	DETECTION LIMIT
Trichloroethene	1,800	50
1,1,1-Trichloroethane	540	50
Tetrachloroethene	290	50

NOTE: ND (None Detected)
J (Detected, but below quantitation limit; quantitation suspect)



WADSWORTH/ALERT
LABORATORIES, INC.

24

COMPANY: Warren Scrap Co.
LAB #: 5833-31916
MATRIX: WATER

DATE RECEIVED: 8/30/88
DATE EXTRACTED: 9/ 9/88
DATE ANALYZED: 9/ 9/88

SAMPLE ID: WS-005

SELECTED ORGANIC COMPOUNDS ANALYTICAL REPORT

PARAMETER	RESULT (ug/l)	DETECTION LIMIT
Trichloroethene	13,000	500
1,1,1-Trichloroethane	ND	500
Tetrachloroethane	ND	500

NOTE: ND (None Detected)
J (Detected, but below quantitation limit; quantitation suspect)



WADSWORTH/ALERT
LABORATORIES, INC.

25

COMPANY: Warren Scrap Co.
LAB #: 5833-31917
MATRIX: WATER

DATE RECEIVED: 8/30/88
DATE EXTRACTED: 9/ 9/88
DATE ANALYZED: 9/ 9/88

SAMPLE ID: WS-006

SELECTED ORGANIC COMPOUNDS ANALYTICAL REPORT

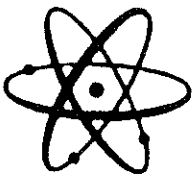
PARAMETER	RESULT (ug/l)	DETECTION LIMIT
Trichloroethene	14,000	500
1,1,1-Trichloroethane	ND	500
Tetrachloroethene	ND	500

NOTE: ND (None Detected)
J (Detected, but below quantitation limit; quantitation suspect)

4101 SHUFFEL DRIVE N.W./NORTH CANTON, OHIO 44720
(216) 497-9396

№ 10667

[illegible]



M & M Consultants, Inc.

"Chemical Science in Industry"
P.O. Box 36, Youngstown, Ohio 44501

27

Tel. 216-742-3669
216-726-0363

Analysts.
Dr. H.D. Mettee, Ph.D.
Mr. F.R. Manley, V.P.

October 25, 1988

Mr. Bill Murray, Manager
Warren Scrap Company
641 Griswald Street
Warren, Ohio 44481

Report of Analyses of Water Samples Picked Up October 3, 1988

Method. Five sample bottles containing the appropriate preservative where required (eg. NaOH for CN) were composited from four casts of a bucket into the pit of Warren Scrap, and stored over ice while being transferred to the lab for analysis.

<u>Results.</u>	<u>Parameter</u>	<u>Value (mg/L)</u>
	pH	7.5 su
	Susp.Sol.	13
	Total Sol.	491
	Oil & Grease	14
	BOD	15
	COD	460
	Phosphate(P)	0.34
	Cyanide	0.030
	TOX*	3.74
	Cadmium	< 0.002
	Chromium	0.006
	Copper	0.011
	Lead	0.020
	Nickel	0.043
	Silver	< 0.005
	Zinc	0.083

* Total Organic Chlorides. Sample stored with no headspace.

Howard D. Mettee

Howard D. Mettee

c.Mr. Morton Levy

Rec'd 10/27/88

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CITY OF WARREN, OHIO

DANIEL J. SFERRA, Mayor

STEPHEN J. PAPALAS, Director of Service-Safety
CITY HALL
391 Mahoning Ave., N.W.
Telephone: 841-2601

HENRY J. ANGELO, Superintendent
WASTE WATER TREATMENT PLANT
2323 Main Ave., S.W.
Warren, Ohio 44481
Telephone: 841-2591

November 16, 1988

Mr. William Murray
General Manager
Warren Scrap
641 Griswold Street N.E.
Warren, Ohio 44481

Dear Mr. Murray:

On Monday, November 14, 1988 you were permitted to discharge 9000 gallons of contaminated water from the old baler pit into Warren's sewer system.

Per Ordinance No. 9764/87 the charge for this discharge is \$0.02 per gallon. The total price is reflected on the attached invoice.

Sincerely,

Robert E. Barker
Industrial Pre-treatment Coordinator
Water Pollution Control Center

REB:ckk
Attachment

EB-15-89 WED 7:46 WARREN SCRAP Co.

P. 02

Number: _____

Date: 11-14-88

Customer: SHAFFER

Address: _____

Commodity or Remarks: PUR H2O Price: _____

0 4 4 1 7 0

Gross

0 3 5 9 1 0

Tare

8260

Net

Driver 1 On ☐ Off ☒

Shipper: _____

Load No. _____

Weigher: _____

Date: 11-14-88

Number: _____

Customer: SHAFER SANITARY 30

Address: _____

Commodity or Remarks: Pit Water Price: _____

060470 Gross
35910 Tare
24560 Net

Driver On ☐ Off ☒ Shipper: _____
Load No. _____ Weigher: _____

Ticket by: BRECHBUHLER SCALES, INC.
Canton, Cleveland, Columbus,
Cincinnati, Parkersburg, WV

Form HEC-2

P. 03

Date: 11-14-88

Number: _____

Customer: Shaffer Sanitary

Address: _____

Commodity or Remarks: Pit water Price: _____

061110 Gross
034730 Tare
26380 Net

Driver On ☐ Off ☒ Shipper: _____
Load No. _____ Weigher: [Signature]

SHAFFER SANITARY SERVICE, INC.

1240 N. River Rd., N.E.
WARREN, OHIO 44483

INVOICE

21874

3/

(216) 372-3201

TO

WARREN SCRAP
641 CRISWOLD NE
WARREN, OHIO 44483

DATE

11-14-88

CUSTOMER ORDER NO.

PER - BILL MURRAY

SALESPERSON

VIA

TERMS:

QUANTITY

DESCRIPTION

PRICE

AMOUNT

PUMPED 3 LOADS WATER FROM PIT (10,000 GAL)

\$120.00 LD.

\$360 00

EPA
PIT CLEANOUT

DUPLICATE

Thank You!

MORTON L. LEVY & CO.
23260 Shaker Blvd.
Shaker Hts., Ohio 44122
216-991-9323

CONSULTING CHEMICAL ENGINEER & CHEMIST

November 18, 198

Wadsworth/Alert Laboratories, Inc.
5405 E. Schaaf Rd.
P.O. Box 31454
Cleveland, OH 44131

Attn: Mr. Dale Mori

Dear Dale:

With this letter I am submitting three samples for analysis. Two are settled m samples and one is a run off water sample.

We are asking you to analyze each of these samples for the following compounds

- 1. Trichlroethylene
- 2. Perchloroethylene
- 3. 1,1,1, trichloroethane

Reports are to be mailed to me at the address on the letterhead and and to:

Mr. Bill Murray
Warren Scrap Co.
641 Griswold Street, N.E.
Warren, OH 44481

Telephone: 216-373-1391

The samples are marked as follows:

- 1. Sample of Settlings On N. Side of Cement Floor 2.5' f/top of step
- 2. " " " " " " " " " " " "
- 3. Water drip from under girder on S.W. side of pit.

Charges are to be for the account of Warren Scrap, attn: Mr. Bill Murray. I wi appreciate a copy of the invoice with the copy of the analytical report.

Sincerely yours,

Mort Levy
Mort Levy

Wrnsgrp.4

cc: Bill Murray

P.S. to Dale Mori: As it turned out, the samples were delivered to you before the completion of this letter. The samples were delivered Fri. 11/18/88 around 11:15AM. cc:Wm.M.



WADSWORTH/ALERT
LABORATORIES, INC.
Sampling, testing, mobile labs

5405 E. Schaaf Rd./P.O. Box 31454/Cleveland, OH 44131/(216) 642-9151

COPY

33

ANALYTICAL REPORT

Project No. 6678

Presented to :

Bill Murray

Warren Scrap Co.

WADSWORTH/ALERT LABORATORIES, INC.

Dale Mori
Project Manager

J. William Botimer
Laboratory Manager - Cleveland

December 5, 1988



CORPORATE AND LABORATORY: North Canton, Ohio (216) 497-9396
LABORATORY: Cleveland, Ohio (216) 642-9151
LABORATORY: Bartow, Florida (813) 533-2150
SOUTHEAST REGIONAL OFFICE: Lexington, South Carolina (803) 957-6590
24-HOUR ALERT LINE: (216) 497-9338



WADSWORTH/ALERT
LABORATORIES, INC.

COPY

34

December 5, 1988

QUALITY CONTROL NARRATIVE

Wadsworth/ALERT Laboratories, Inc. received samples from Warren Scrap Co. on November 18th which were sampled on November 14th. Sample 35187 for volatile analysis was incorrectly sampled. The container was received with approximately 90% head space. Because of this incorrect sampling, the results are considered suspect and we cannot accept responsibility for the data.

Opal Davis-Johnson
Quality Control Coordinator
Cleveland Laboratory



WADSWORTH/ALERT
LABORATORIES, INC.

COPY

35

COMPANY: Warren Scrap Co.
LAB #: 6678-35185
MATRIX: SOLID

DATE RECEIVED: 11/18/88
DATE EXTRACTED: 11/23/88
DATE ANALYZED: 11/23/88

SAMPLE ID: SETTLINGS ON N. SIDE OF CEMENT FLOOR 2.5' F/TOP OF STEP

SELECTED ORGANIC COMPOUNDS ANALYTICAL REPORT

PARAMETER	RESULT (mg/kg)	DETECTION LIMIT
Trichloroethene	5.4	0.4
Tetrachloroethene	0.34	0.1
1,1,1-Trichloroethane	ND	0.1

NOTE: ND (None Detected)
J (Detected, but below quantitation limit; quantitation suspect)



WADSWORTH/ALERT
LABORATORIES, INC.

COPY

36

COMPANY: Warren Scrap Co.

LAB #: 6678-35186

MATRIX: SOLID

DATE RECEIVED: 11/18/88

DATE EXTRACTED: 11/23/88

DATE ANALYZED: 11/23/88

SAMPLE ID: SETTLINGS ON S. SIDE OF CEMENT FLOOR 2.5' F/TOP OF STEP

SELECTED ORGANIC COMPOUNDS ANALYTICAL REPORT

PARAMETER	RESULT (mg/kg)	DETECTION LIMIT
Trichloroethene	7.5	0.4
Tetrachloroethene	0.89	0.1
1,1,1-Trichloroethane	ND	0.1

NOTE: ND (None Detected)
J (Detected, but below quantitation limit; quantitation suspect)



WADSWORTH/ALERT
LABORATORIES, INC.

COPY

37

COMPANY: Warren Scrap Co.
LAB #: 6678-35187
MATRIX: LIQUID

DATE RECEIVED: 11/18/88
DATE EXTRACTED: NA
DATE ANALYZED: 11/23/88

SAMPLE ID: WATER DRIP FROM UNDER GIRDER SW SIDE OF PIT

SELECTED ORGANIC COMPOUNDS ANALYTICAL REPORT

PARAMETER	RESULT (ug/l)	DETECTION LIMIT
Trichloroethene	24	20
Tetrachloroethene	5	1
1,1,1-Trichloroethane	ND	1

NOTE: ND (None Detected)
J (Detected, but below quantitation limit; quantitation suspect)

4101 SHUFFEL DRIVE N.W./NORTH CANTON, OHIO 44720
(216) 497-9396



11532

PROJ. NO.	PROJECT NAME/LOCATION
-----------	-----------------------

WARRNER SCAMP

SAMPLERS: (Signature)

³⁾ Martin J. Seng, D.E.

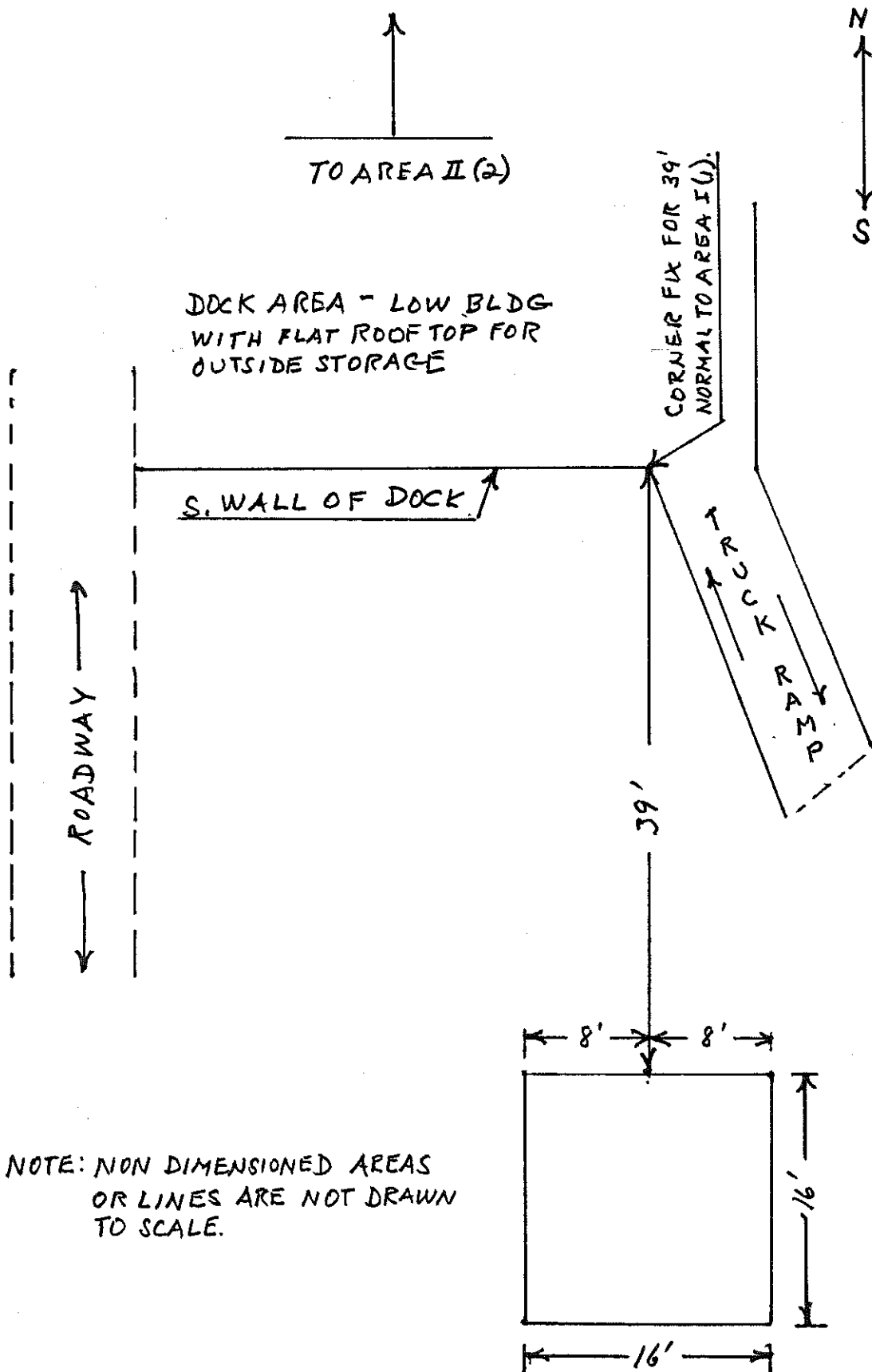
NO.
OF
CON-
TAINERS

PARAMETER

REMARKS

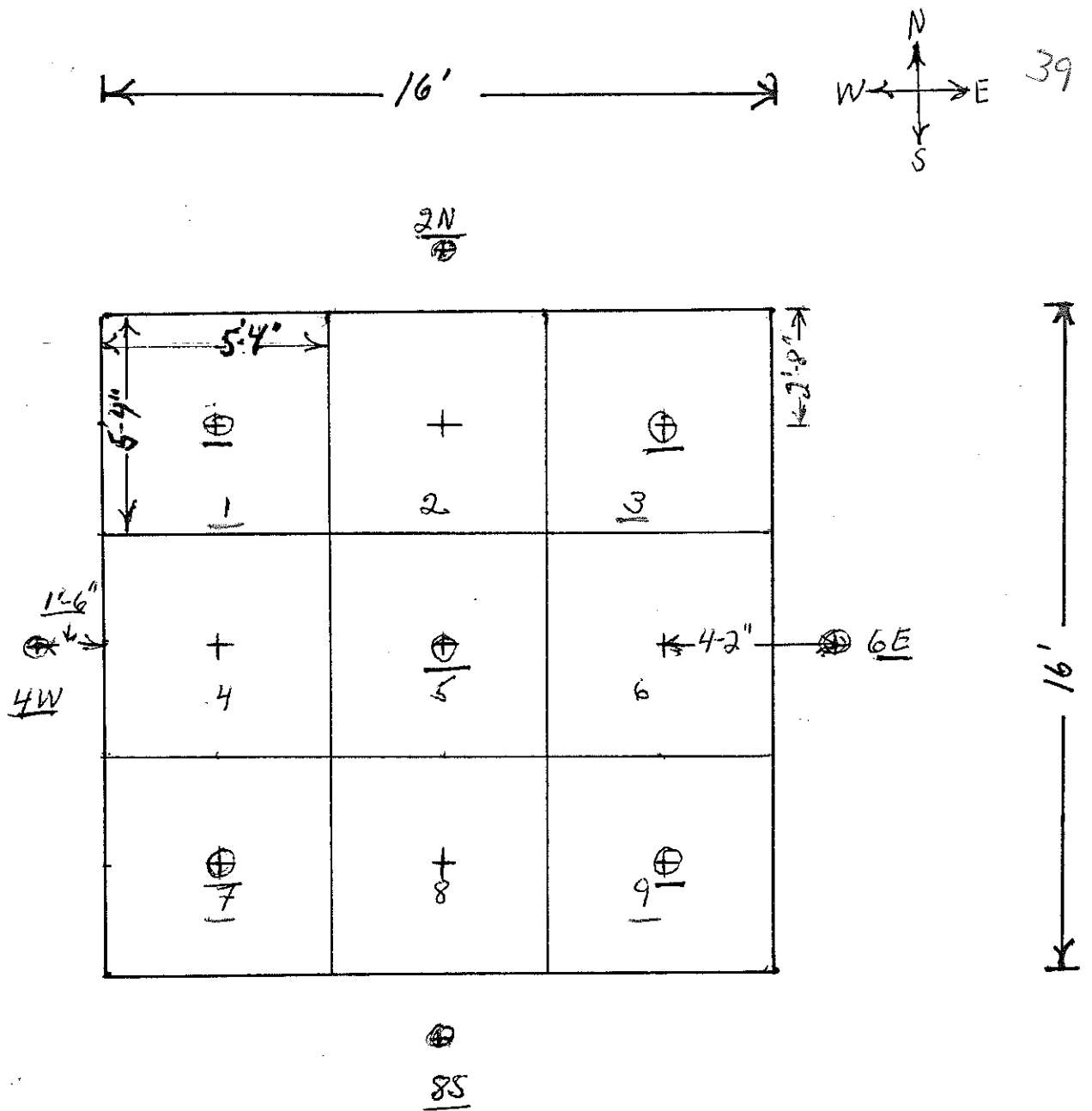
[illegible]

Distribution Original Accompanies Shipment. Copy returned with Report..



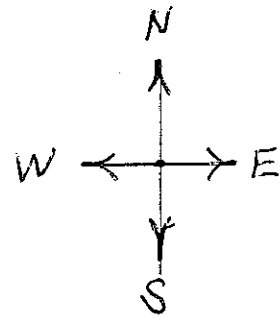
PLAN VIEW, LOCATION OF AREA I (1)

SCALE 1" = 10' BY M.A.

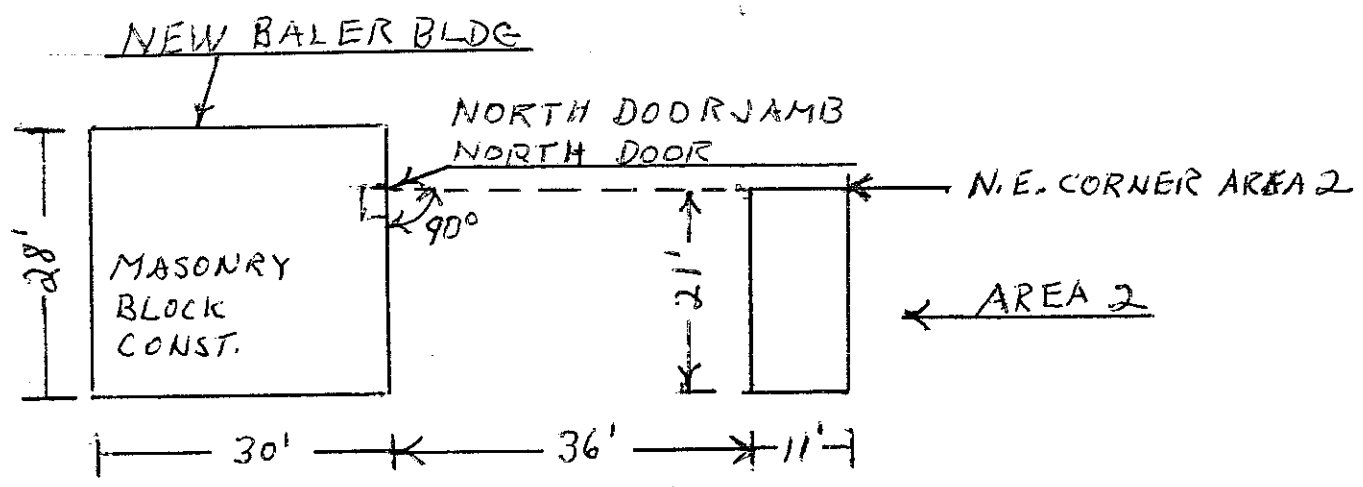


PLAN VIEW AREA I(1) GRID PLAN

SCALE 1" = 4' by med.

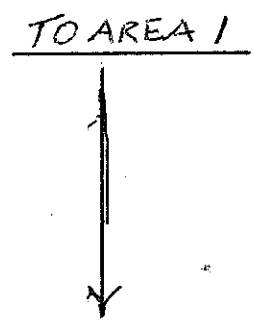


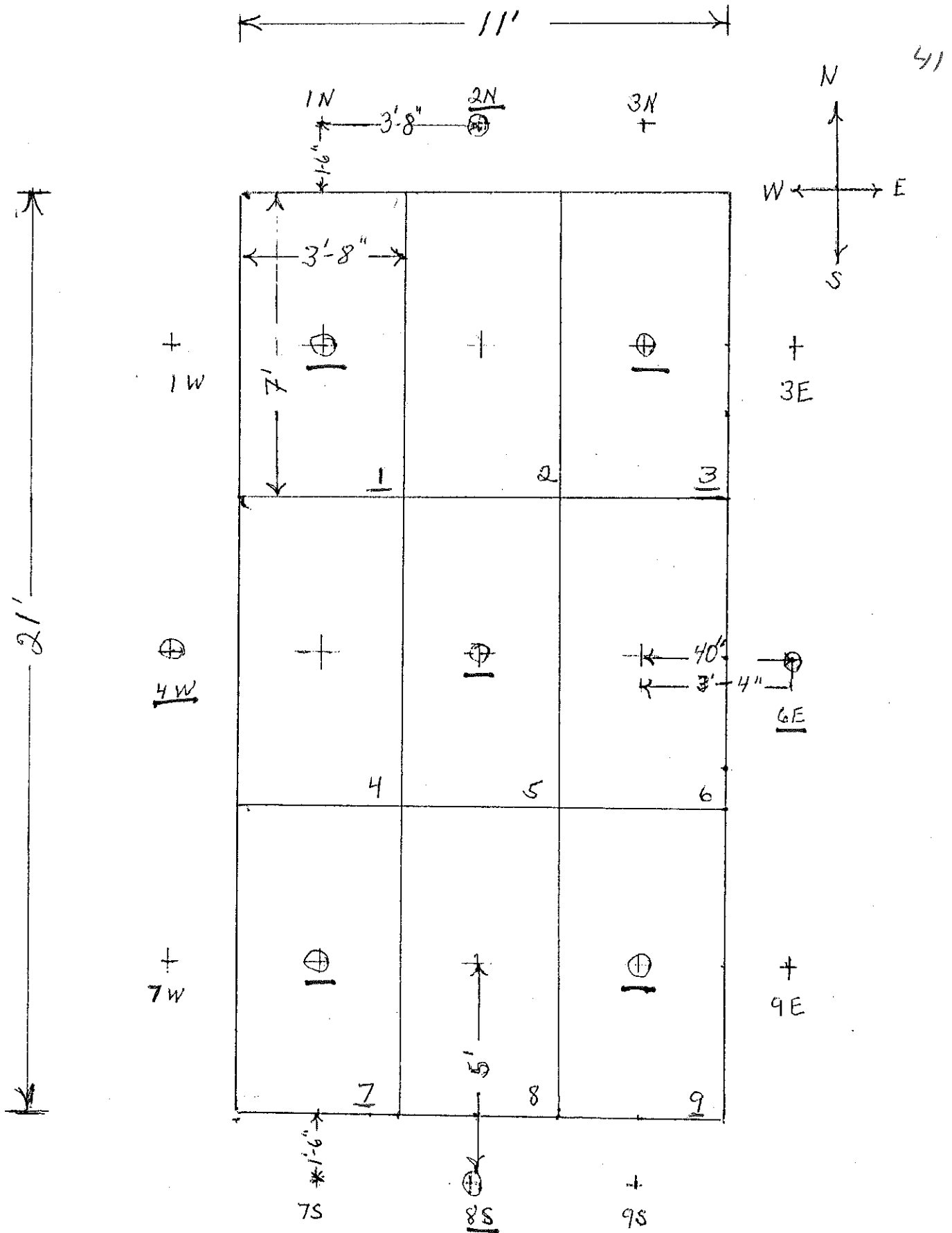
TO: AREA III(3), OLD BALER PIT



PLAN VIEW OF LOCATION OF AREA 2

SCALE 1" = 20' BY MKL





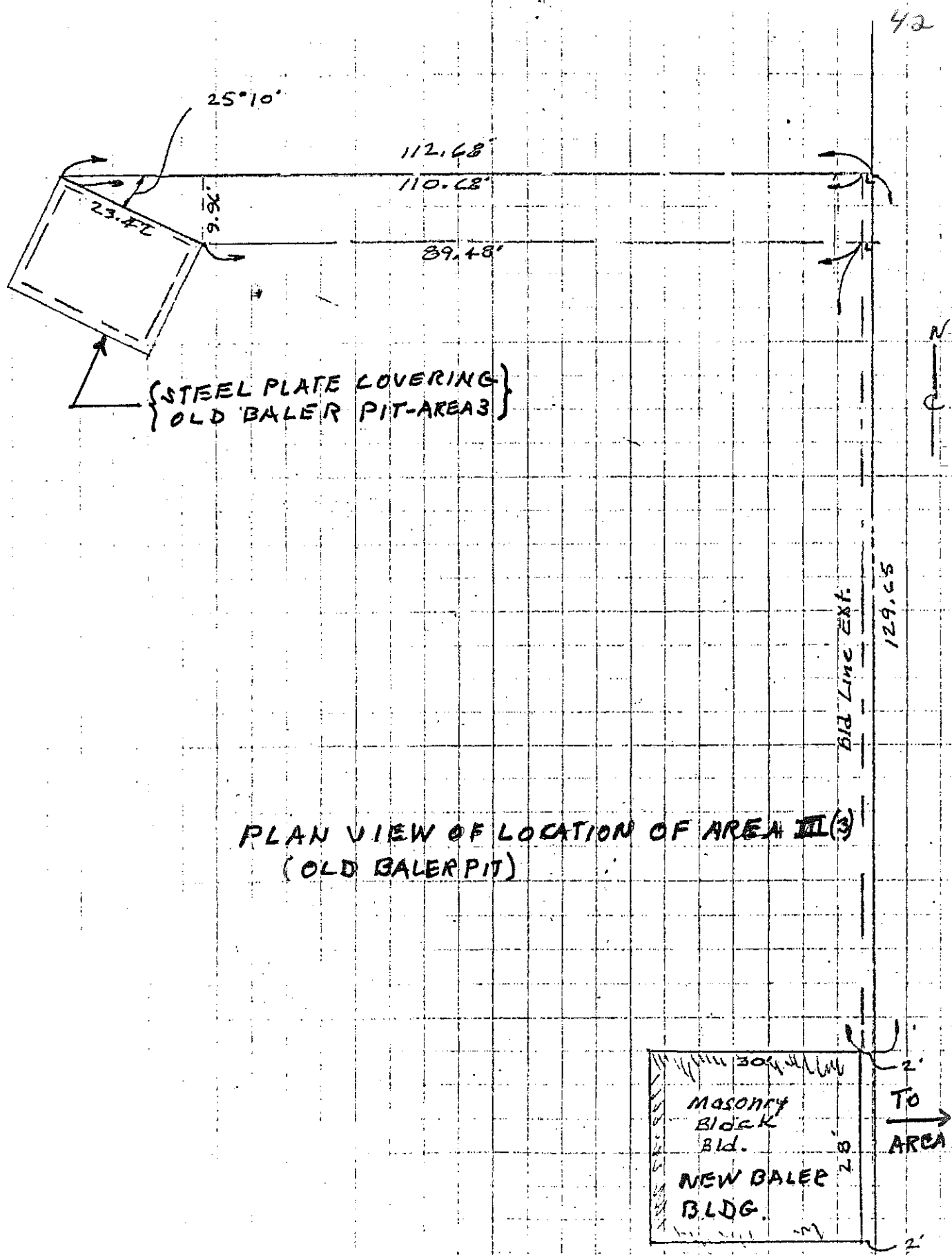
PLAN VIEW - AREA 2 GRID PLAN

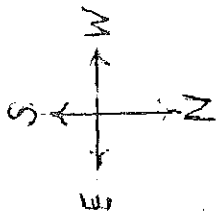
Scale: 1" = 3' MLL *MLL*

A. C. CHARNAS & ASSOC.
ENGINEERS & CONSULTANTS
WARREN, OHIO

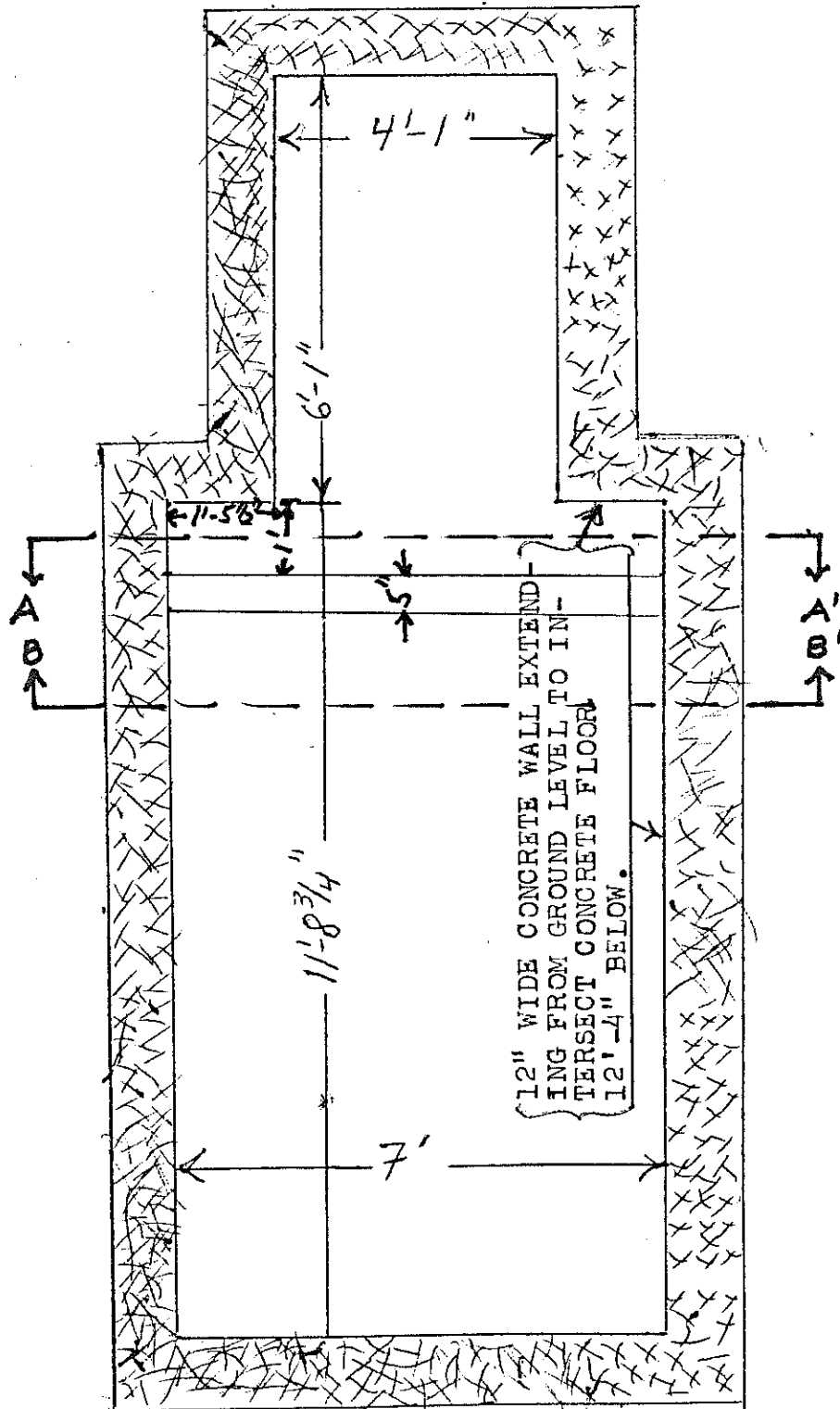
TIES TO
SUBJECT NEW Baler
WARREN Scrap

BY JSR DATE 2/3/89
SHEET NO. OF
JOB NO. 8903



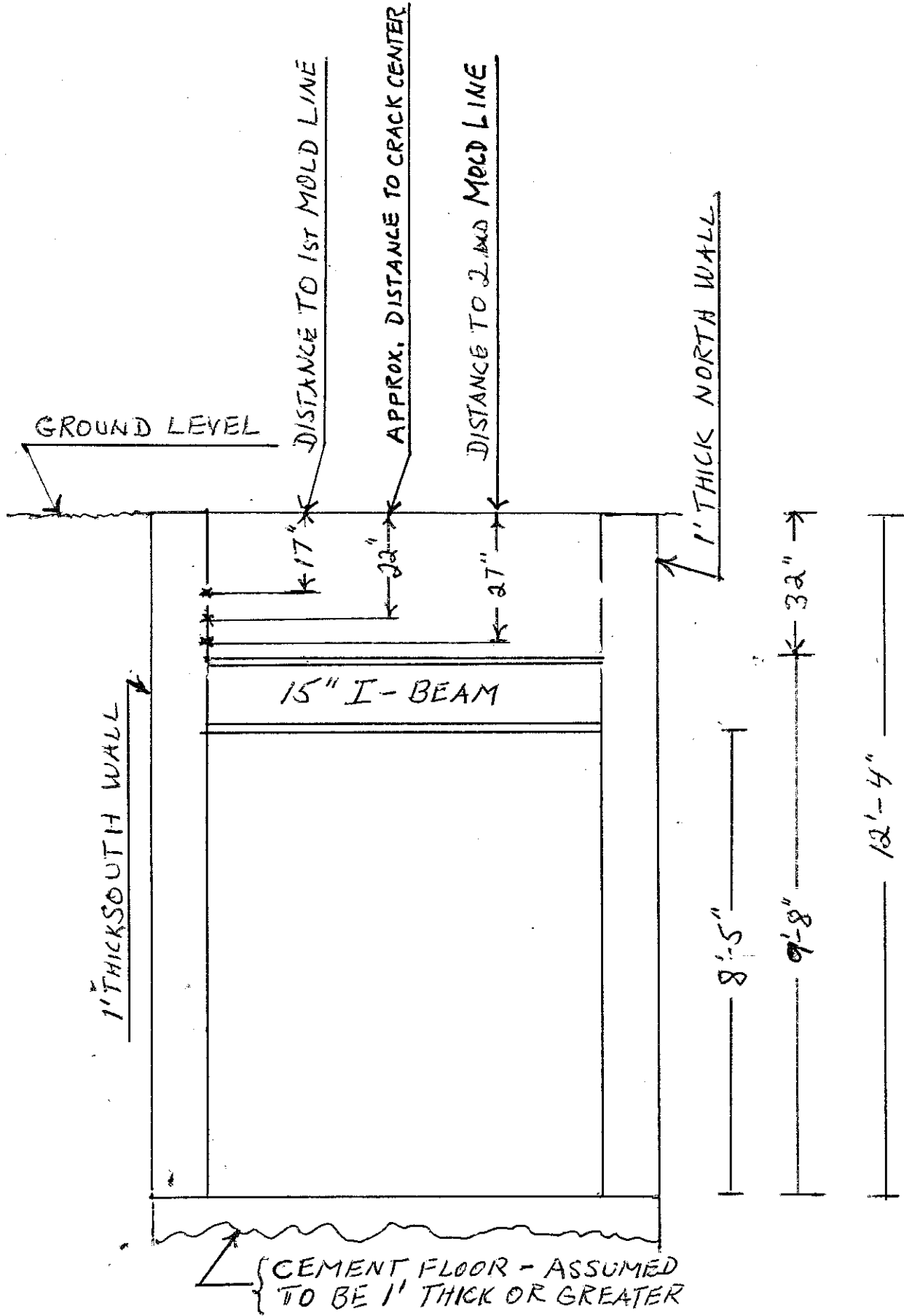


43



SCALE: 1 CM = 1"
By MLL

PLAN VIEW OF OLD BALER PIT (AREA 3)



ELEVATION OF "OLD BALER PIT" BETWEEN A-A' AND B-B' SHOWN ON PLAN VIEW

SCALE: 1/8" = 1' MAX



POLAROID PHOTOGRAPH (COPY) TAKEN BY BILL MURRAY,
GEN. MGR. OF WARREN SCRAP CO. ON 5/26/88 IN
PRESENCE OF MORT LEVY.

COMPARE WATER LEVEL IN PIT (CAN BE DONE BEST WITH
A MAGNIFYING LENS IN GOOD LIGHT) BY LOOKING ON
RIGHT SIDE IN SHADOW. PLEASE NOTE THAT WATER LEVEL
IS VERY NEAR THE SAME AS IN PHOTOS TAKEN ON 8/30/88
(#'s 13, 14, 14A and 16).

WARREN SCRAP CO., 641 GRISWOLD ST., WARREN, OH, 44481

ATTN: MR. WM. MURRAY, GEN. MGR.: SUBJECT: CLOSURE OLD
BALER PIT. PHOTOS TAKEN 8/30/88 PRIOR TO WATER SAMP-
LING. SAMPLES TAKEN IN CONJUNCTION W/ OH EPA.

NEGATIVE* LEGEND FILE: WRNSCP1.WK1

- =====
- 10A. Old baler pit covered w/steel plate. View E.
to W.
 - 12. Crane arriving to remove steel plate.
 - 13. Plate removed. View f/E. to W.
 - 14. As above. View f/W. to E. Can in foreground
on Westerly edge of pit.
 - 14A. Pit view f/S. to N. West edge out of range.
 - 16. As above. W. edge of pit in range.

* Photo no.'s are same as negative numbers.

WRNSCP1.WK1

NEGATIVE

#10A



#12



WRNSCP1.WK1

NEGATIVE

#13



WRNSCP1.WK1

NEGATIVE

#14



WRNSCP1.WK1

NEGATIVE

#14A



#16



WARREN SCRAP CO., 641 GRISWOLD ST., WARREN, OH, 44481

ATTN: MR. WM. MURRAY, GEN. MGR.: SUBJECT: CLOSURE OLD
BALER PIT. PHOTOS TAKEN 11/14/88. WATER PUMPED F/PIT,
INSPECTED. 2 SEDIMENT & 1 WATER SAMPLE TAKEN.*

NEGATIVE* LEGEND FILE: WRNSCP2.WK1

- =====
- 18A. Crack along S. wall near W. end.

 - 20. View of S. wall, E. and below of view above.

 - 21. View of debris & soil on N. side of slot.

 - 22. View of crack on N. Wall.

 - 22A. View of location of SLOW water drip f/under
 S. end of girder estimated 3.5 ft. f/pit top.

 - 24. View of pit floor f/N. to S.; Intersection
 of S. wall w/floor.

 - 24A. View of pit floor f/S. to N.; Intersection
 of N. wall w/floor.

* Photo no.'s are same as negative numbers.

WRNSCP2.WK1

NEGATIVE

#18A



#20



WRNSCP2.WK1

NEGATIVE

#21



H22



WRNSCP2.WK1

NEGATIVE

#22A



#24



WRNSCP2.WK1

NEGATIVE

#24A



**D. Corrective
Action**



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5

MEMORANDUM

DATE:
SUBJECT: Determination of Need for an Investigation
Facility Name: Carballoy Steel Co. Inc/ Warren Scrap Metal/JRT
EPA ID #: OHD 077 752 640

FROM: Jacob W. Hartle
Jacob W. Hartle, Environmental Protection Specialist

TO: George Hamper, Chief, Corrective Action Section 2

I recommend the following determination regarding the need for an investigation:

☒ **CA070NO Determination of Need for an Investigation-Investigation is not Necessary**

Reason for Determination

- ☐ Preliminary Assessment/Visual Site Inspection (PA/VSI) did not recommend any further investigation
- ☐ PA/VSI recommendations do not warrant RRB attention
- ☐ Phase 1 Environmental Site Assessment (ESA) did not recommend further investigation
- ☐ Phase 2 ESA did not recommend further investigation
- ☐ Phase 1/Phase 2 ESA recommendations do not warrant RRB attention
- ☒ Company representative asserts that the site is clean
- ☐ Not subject to corrective action
- ☐ Enrolled in other clean-up program
- ☐ PA/VSI recommendations have been implemented
- ☐ Removal
- ☐ Enrolled Voluntary Remediation Program
- ☐ Completed Voluntary Remediation Program
- ☐ Superfund
- ☐ Superfund No Further Action Decision
- ☐ Superfund Base Relocation and Closure
- ☐ Other

☐ **CA070YE Determination of Need for an Investigation – Investigation is Necessary**

Reason for Determination

- ☐ PA/VSI recommends further investigation
- ☐ ESA recommends further investigation
- ☐ Other

☐ **No determination can be made – More Information Needed**

☒ **Approved**

☐ **Not Approved**

JUN 02 2010

Signed: George Hamper Date: _____

Determination Date:

Determination: Company representative asserts that the site is clean

Facility Contact Form (No PA/VSI)

Facility Name: Carballoy Steel Co. Inc/ Warren Scrap Meal/ JRT

EPA ID#: OHD077752640

Address: 641 Griswold St. Ne

City: Warren State: OH

Units Closed: SO1 Areas 1,2,3 Date: 9/9/1993

Facility Representative: Jamie Knox Phone# (330) 373-1391

cell #
330-540-6560

Email Address: _____

Date of phone conversation: February 2010

RCRA Site Detail (Notes)

Notes: WARREN SCRAP COMPANY CONDUCTED A ONE-TIME CLEANUP UNDER RCRA DURING 1991. THE COMPANY PERMANENTLY CLOSED THE STORAGE AREA WITH PROPER DOCUMENTATION IN 1991. NO FURTHER ACTIVITY WILL BE CONDUCTED ON OUR PROPERTY UNDER RCRA.

Notes: HAZARDOUS WASTE AT OUR SCRAP YARD WAS A ONE TIME OCCURANCE. WE ARE UNDERGOING CLOSURE. WE DO NOT AND WILL NOT ACCEPT HAZARDOUS WASTE IN THE FUTURE.

Jamie Knox said that this site has been a scrap transfer yard for 30-40yrs. Small loads of scrap are kept there till a large load can be transferred to the processing facility. He asserts that the site is clean.

Y / **N** Is there known soil or groundwater contamination?

Contaminants:

Y / **N** Has the parcel been split or was there a change in ownership?

Y / **N** / ? Was a Phase 1 or Phase 2 report prepared in connection with a sale of the property?

Y / **N** Can we have a copy?

Y / **N** Is the facility currently operating? **Scrap Iron**

- When was the plant built? _____
- What products are/were made?

- What chemicals were used in the process?

-Ingredients: **None**

-Solvents for cleaning products: **None**

-Solvents for degreasing machinery: **None**

-Fuels (coal/gasoline/fuel oil): **Fuel truck**

Y / N Are there any known spills from electrical equipment containing PCBs?

Y / N Have spills always been cleaned up properly?

- What kinds of solid wastes were produced?

- How were solid wastes managed?

Y / N Waste piles Quantity: _____

Containing: **Scrap Iron is product not waste.**

Y / N On-site landfill Quantity: _____

Containing:

- How were liquid wastes (such as solvents) managed?

Y / N Drums

Containing:

Y / N Above-ground tanks Quantity: _____

Containing:

Y / N Underground tanks Quantity: _____ How long have they been in use? _____

What are they made out of: Steel / Cement / Other: _____

Any known leaks:

Y / N Underground pipes

Containing:

- How were wastewaters managed?

Y / N Tanks

Y / N Pits, ponds, or lagoons (surface impoundments)